

FM Series III: Payment Discrepancy Disputes

November 16, 2015

Financial Management Series III

Agenda

- Session Guidelines
- Background
- Discrepancy Reporting Process
- Updating Banking & Billing Information
- Closing
 - Resources
 - Closing Remarks

Session Guidelines

- This is a 90-minute webinar 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 Series III Continuation

- The Centers for Medicare & Medicaid Services (CMS) will continue to roll out trainings throughout 2015 and 2016.
- Series III provides additional information related to testing, timelines, HIX 820 scenarios, and any additional guidance related to the 2016 transition.
- As part of this series, CMS will conduct Monday content webinars and Friday Q&A sessions at least through the end of 2015.

FM Series III Dates: November 2015

Date of Session	Time	Target Audience	Session Title
November 2, 2015	2:00 – 3:30 p.m. ET	FFM and SBM Issuers	CANCELLED
November 6, 2015	12:00 – 1:00 p.m. ET	FFM and SBM Issuers	Q&A
November 9, 2015	2:00 – 3:30 p.m. ET	FFM and SBM Issuers	Webinar
November 13, 2015	12:00 – 1:00 p.m. ET	FFM and SBM Issuers	Q&A
November 16, 2015	2:00 – 3:30 p.m. ET	FFM and SBM Issuers	Webinar
November 20, 2015	12:00 – 1:00 p.m. ET	FFM and SBM Issuers	Q&A
November 23, 2015	2:00 – 3:30 p.m. ET	FFM and SBM Issuers	Webinar
November 27, 2015	HOLIDAY	N/A	N/A
November 30, 2015	2:00 – 3:30 p.m. ET	FFM and SBM Issuers	Webinar

Background

Current Payment Process

- Currently, Issuers use the Manual Payment Process (MPP).
- Issuers may email the marketplace payments mailbox at marketplacepayments@cms.hhs.gov with any unresolved payment discrepancies.
- Starting in 2016, Issuers will follow the Policy-based Payments (PBPs) process.

Background

- Payments for Advance Premium Tax Credit (APTC), Cost-sharing Reduction (CSR), and User Fees are based on member enrollment information.
- When an Issuer identifies a problem with an APTC, CSR or User Fee payment, they must determine the cause of the payment problem.
- Payment problems can be caused by incorrect enrollment information or system issues.
- There are various tools, such as the monthly Preliminary Payment Report (PPR), HIX 820, Pre-audit file and System Calendar, that can be used to determine if a payment issue is enrollment related, a system issue, or a timing issue.

Discrepancy Reporting

Discrepancy Reporting Process

- Payees are required to report policy and program payment discrepancies, identified in the PPR or the HIX 820 beginning in 2016.
 - Payees are encouraged to test the discrepancy reporting process during the 2015 Pilot Phase.
- When a payment discrepancy is identified, Payees **must** use the approved Excel template only **and** submit discrepancies via EFT to the ER&R Contractor.
 - During pilot testing phase only, issuers may submit test payment discrepancies via email; email submissions **must** be zipped and encrypted to errsupportcenter@cognosante.com.

Discrepancy Reporting Process,

Continued

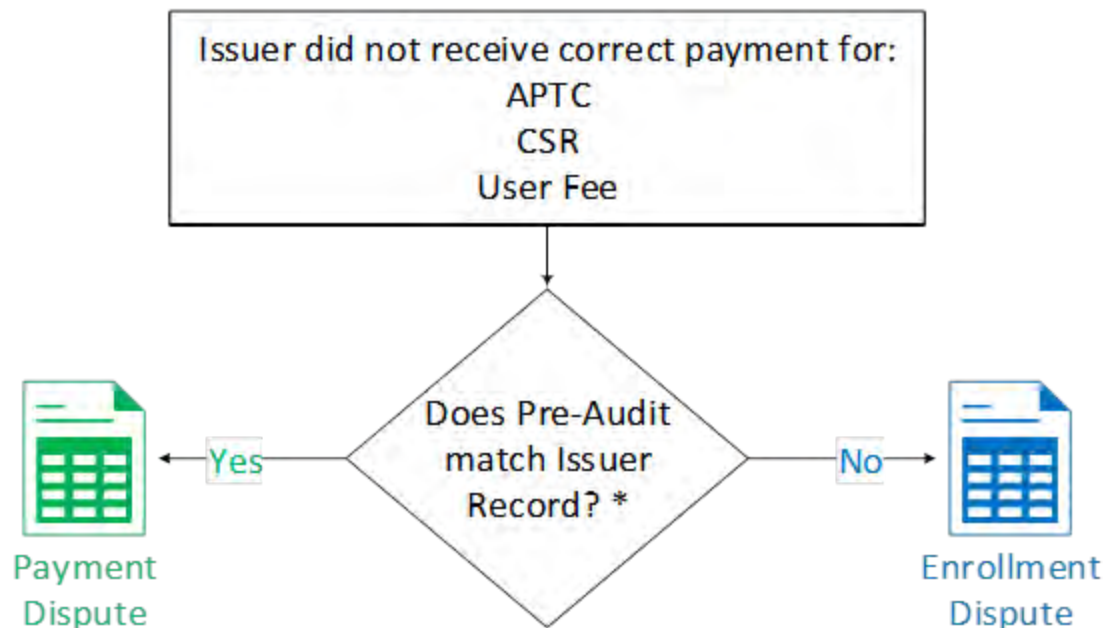
- Discrepancy files are acknowledged via email by the next business day.
- CMS, along with the Enrollment Reconciliation & Resolution (ER&R) Contractor, investigates the discrepancies and provides feedback, and takes action (as needed).
- ER&R Contractor notifies status of discrepancies on a semi monthly status report.
 - o The filename is: Status Report
- Any changes to a 2016 payment or charge will be reflected in a future month's PPR and HIX 820 Payment Transaction.

Dispute Types: Payment vs Enrollment

- A **payment discrepancy** is possible **only** when the Pre-audit matches the Issuer system.
- An **enrollment discrepancy** is possible when the Pre-audit **does not match** the Issuer system; however, not all enrollment discrepancies will result in an enrollment dispute.
 - Most enrollment discrepancies can be resolved when the Federally-facilitated Marketplace (FFM) or issuer system is updated through the monthly enrollment reconciliation process. Most updates to the FFM can be made through the RCNI file.
- Issuers should closely examine their systems to:
 - correctly identify whether a discrepancy exists.
 - determine whether it is a Payment or Enrollment discrepancy dispute.
- Payment discrepancy disputes cannot be determined or resolved until enrollment discrepancies for the same policy and period are resolved.

Discrepancy Dispute

How to distinguish between a Payment Dispute and an Enrollment Dispute



*** Exception for Partial Month Policies**

When the Benefit (Start or End) Date is the same on both the Pre-Audit and the Issuer system, regardless of the dates or values associated with APTC, CSR, or Total Premium, this is considered a payment dispute.

However, if the Benefit (Start or End) Date on the Pre-Audit differs from that in the Issuer system, this should be submitted on the RCNI file.

Payment Discrepancy Disputes: FFM's Pre-Audit and Issuer's System Data Match

- **If a Payment is Missing From the PPR or 820 and:**
 - o Pre-audit shows APTC/CSR/Total Premium amounts for same policy and period, and
 - o Issuer system shows exact same APTC/CSR/Total Premium amounts for same policy and period,
 - Then the Issuer Action is: Report as a Missing Payment dispute.
- **If a Payment is Duplicated From the PPR or 820 and:**
 - o Pre-audit shows one APTC/CSR/Total Premium amount for same policy and period, and
 - o Issuer system shows exact same one APTC/CSR/Total Premium amount for same policy and period,
 - Then the Issuer Action is: Report as a Duplicate Payment dispute.
- **If a Payment From the PPR or 820 is Different Than the Matching Pre-Audit/Issuer Values and:**
 - o Pre-audit shows an APTC/CSR/Total Premium amount for same policy period, and
 - o Issuer system shows exact APTC/CSR/Total Premium amount for same policy period,
 - Then the Issuer Action is: Report as Mismatch Payment dispute.

Payment Discrepancy Dispute: Missing Payment

Scenario:

- FFM Pre-audit file and Issuer have matching values for APTC in the amount of \$56.57 for policy 17054371021.
- Upon receipt of the PPR for same Payment Period, the APTC for policy 17054371021 is not included.

Pre-Audit Snapshot

(excerpt)

<Pre-audit field 68>	<Pre-audit field 70>	<Issuer System>
Exchange-Assigned Policy Number	Applied APTC Amount	Applied APTC Amount
17054371021	56.57	56.57

Preliminary Payment Report

(excerpt)

Issuer ID	Exchange Assigned Policy ID	Exchange Payment Type	Payment Amount	Coverage Period Start Date	Coverage Period End Date

Policy Payment Discrepancy

HIOS ID	Preliminary Report Control Number or 820 EFT Trace Number	Exchange Assigned Policy ID	Payment Period	Dispute Type	Payment Type Code	Issuer Value	Payment Value	Issuer Comments
12345	123456789	17054371021	20150701-20150731	Missing	APTCADJ	\$56.57	\$0.00	Missing payment of \$56.57 for policy 17054371021.

Payment Discrepancy Dispute: Duplicate Payment

Scenario:

- FFM Pre-audit file and Issuer have matching values for APTC in the amount of \$56.57 for policy 17054371021.
- Upon receipt of the PPR for same Payment Period, policy 17054371021 shows two APTC values, each for \$56.57.

Pre-Audit Snapshot

(excerpt)

<Pre-audit field 68>	<Pre-Audit field 70>	<Issuer System>
Exchange-Assigned Policy Number	Applied APTC Amount	Applied APTC Amount
17054371021	56.57	56.57

Preliminary Payment Report

(excerpt)

Issuer ID	Exchange Assigned Policy ID	Exchange Payment Type	Payment Amount	Coverage Period Start Date	Coverage Period End Date
12482	17054371021	APTCADJ	56.57	20150701	20150731
12482	17054371021	APTCADJ	56.57	20150701	20150731

Policy Payment Discrepancy

HIOS ID	Preliminary Report Control Number or 820 EFT Trace Number	Exchange Assigned Policy ID	Payment Period	Dispute Type	Payment Type Code	Issuer Value	Payment Value	Issuer Comments
12345	123456789	17054371021	20150701-20150731	Duplicate	APTCADJ	\$56.57	\$56.57	Received two payments of \$56.57 for policy 17054371021.

Payment Discrepancy Dispute: Mismatch

Scenario:

- FFM Pre-audit file and Issuer have matching values for APTC in the amount of \$56.57 for policy 17054371021.
- Upon receipt of the PPR for same Payment Period, policy 17054371021 shows an APTC value of \$50.00.

Pre-Audit Snapshot

(excerpt)

<Pre-audit field 68>	<Pre-Audit field 70>	<Issuer System>
Exchange-Assigned Policy Number	Applied APTC Amount	Applied APTC Amount
17054371021	56.57	56.57

Preliminary Payment Report

(excerpt)

Issuer ID	Exchange Assigned Policy ID	Exchange Payment Type	Payment Amount	Coverage Period Start Date	Coverage Period End Date
12482	17054371021	APTCADJ	50.00	20150701	20150731

Policy Payment Discrepancy

HIOS ID	Preliminary Report Control Number or 820 EFT Trace Number	Exchange Assigned Policy ID	Payment Period	Dispute Type	Payment Type Code	Issuer Value	Payment Value	Issuer Comments
12345	123456789	17054371021	20150701-20150731	Mismatch	APTCADJ	\$56.57	\$50.00	Payment value is different than matching FFM & Issuer enrollment values.

Program Discrepancy Dispute: Duplicate, Missing, or Mismatch

Issuer expects an APTC Manual Adjustment (APTCMADJ) program payment in the amount of \$56.57 for the payment period. The PPR shows an APTCMADJ value of \$50.00.

Preliminary Payment Report (excerpt)

Issuer ID	Exchange Payment Type	Payment Amount	Coverage Period Start Date	Coverage Period End Date
12482	APTCMADJ	50.00	20150701	20150731

Program Payment Discrepancy

<i>HIOS ID</i>	<i>Preliminary Report Control Number or 820 EFT Trace Number</i>	<i>Payment Period</i>	<i>Dispute Type</i>	<i>Payment Type Code</i>	<i>Issuer Value</i>	<i>Payment Value</i>	<i>Issuer Comments</i>
12345	123456789	20150701-20150731	Mismatch	APTCMADJ	\$ 56.57	\$ 50.00	Payment value is different than expected value

Enrollment Discrepancy Disputes: FFM's Pre-Audit and Issuer's System Data Do Not Match

- **If a Payment is Missing From the PPR or 820, and**
 - o Pre-audit does not contain policy for same payment period, and
 - o Issuer system shows an APTC/CSR/Total Premium amount for same policy and period,
 - Then the Issuer Action is: Report as either a start or end date dispute, or an Issuer Orphan enrollment dispute.
- **If a Payment is Missing From the PPR or 820, and**
 - o Pre-audit shows an APTC/CSR/Total Premium amount for same policy and period, and
 - o Issuer system shows a different APTC/CSR/Total Premium amount for same policy and period,
 - Then the Issuer Action is: Report as an APTC, CSR, or Total Premium enrollment dispute.
- **If a Payment is Missing From the PPR or 820, and**
 - o Pre-audit shows an APTC/CSR/Total Premium amount for same policy and period, and
 - o Issuer system does not contain policy for same payment period,
 - Then the Issuer Action is: Report either a start or end date dispute, or an FFM Orphan enrollment dispute.

Enrollment Discrepancy Disputes:

FFM's Pre-Audit and Issuer's System Data Do Not Match

(continued)

- **If a Payment is Duplicated on the PPR or 820, and**
 - o Pre-Audit does not contain policy for same period, and
 - o Issuer system shows an APTC/CSR/Total Premium amount for policy and period,
 - Then the Issuer Action is: Report as either a start or end date dispute, or an Issuer Orphan enrollment dispute. This scenario should be identified when enrollment discrepancies (not disputes) are worked.
- **If a Payment is Duplicated on the PPR or 820, and**
 - o Pre-Audit shows an APTC/CSR/Total Premium amount for same policy period, and
 - o Issuer system does not contain policy for same policy period,
 - Then the Issuer Action is: Report as either a start or end date dispute, or an FFM Orphan enrollment dispute. This scenario should be identified when enrollment discrepancies (not disputes) are worked.
- **If the Payment From the PPR or 820 is different Than the Pre-Audit Value and the Issuer Value (all 3 are discrepant), and**
 - o Pre-Audit shows an APTC/CSR/Total Premium amount for same policy and period, and
 - o Issuer system shows different APTC/CSR/Total Premium amount for same policy and period,
 - Then the Issuer Action is: Report as an APTC, CSR, or Total Premium enrollment dispute.

Enrollment Discrepancy Dispute: Mismatch

Scenario:

- FFM Pre-audit file and Issuer have different values for APTC. The FFM amount has \$35.88 and the Issuer has \$56.57 for policy 17054371021. Upon receipt of the PPR for same Payment Period, policy 17054371021 shows an APTC value of \$35.88.

Pre-Audit Snapshot

(excerpt)

(Pre-audit field 68> Exchange-Assigned Policy Number	<Pre-Audit field 70> Applied APTC Amount	<Issuer System> Applied APTC Amount
17054371021	35.88	56.57

Preliminary Payment Report

(excerpt)

Issuer ID	Exchange Assigned Policy ID	Exchange Payment Type	Payment Amount	Coverage Period Start Date	Coverage Period End Date
12482	17054371021	APTCADJ	35.88	20150701	20150731

Policy Payment Discrepancy

FFM Internal Inventory Number for record in dispute	Description of Disputed Item DO NOT INCLUDE PII IN THIS AREA	Issuer Value	FFM Value	Issuer Comments
0000000000	APTC Amount mismatch in Pre-Audit snapshot	\$56.57	\$35.88	

Partial Month Exceptions

- **If a Payment From the PPR or 820 is Different Than the Issuer Value, and**
 - o Pre-audit Benefit (Start or End) date matches the Issuer's Benefit (Start or End) date, regardless of the dates and values associated with APTC, CSR, or Total Premium
 - Then the Issuer Action is: Report as Mismatch Payment dispute.
- **If a Payment From the PPR or 820 is Different Than the Issuer Values, and**
 - o Pre-audit Benefit (Start or End) date does not match the Issuer's Benefit (Start or End) date, regardless of the dates and values associated with APTC, CSR, or Total Premium
 - Then the Issuer Action is: Submit RCNI file for potential FFM update.

Partial Month Exception: Payment Dispute

FFM Pre-audit file and Issuer have matching Benefit Start Date of 7/10/15 for policy 17054371021. Upon receipt of the PPR for same Payment Period, policy 17054371021 shows an APTC value of \$50.00.

Pre-Audit Snapshot

(excerpt)

<Pre-audit field 68>	<Pre-Audit field 70>	<Issuer System>	<Pre-Audit field 65>	<Issuer System>
Exchange-Assigned Policy Number	Applied APTC Amount	Applied APTC Amount	Benefit Start Date	Benefit Start Date
17054371021	56.57	56.57	20150710	20150710

Preliminary Payment Report

(excerpt)

Issuer ID	Exchange Assigned Policy ID	Exchange Payment Type	Payment Amount	Coverage Period Start Date	Coverage Period End Date
12482	17054371021	APTCADJ	50.00	20150710	20150731

Policy Payment Discrepancy

HIOS ID	Preliminary Report Control Number or 820 EFT Trace Number	Exchange Assigned Policy ID	Payment Period	Dispute Type	Payment Type Code	Issuer Value	Payment Value	Issuer Comments
12345	123456789	17054371021	20150710-20150731	Mismatch	APTCADJ	\$56.57	\$50.00	Prarated APTC value appears to be incorrect..

Partial Month Exception: Potential RCNI Update

Upon receipt of the PPR, policy 17054371021 shows an APTC value of \$50.00. The Benefit Start Date in the Pre-audit file and Issuer system differ for policy 17054371021.

Pre-Audit Snapshot

(excerpt)

<Pre-audit field 68>	<Pre-Audit field 70>	<Issuer System>	<Pre-Audit field 65>	<Issuer System>
Exchange-Assigned Policy Number	Applied APTC Amount	Applied APTC Amount	Benefit Start Date	Benefit Start Date
17054371021	56.57	56.57	20150709	20150710

Preliminary Payment Report

(excerpt)

Issuer ID	Exchange Assigned Policy ID	Exchange Payment Type	Payment Amount	Coverage Period Start Date	Coverage Period End Date
12482	17054371021	APTCADJ	50.00	20150710	20150731

Key Points

- When FFM and Issuer records for Benefit Start and End Date do not match, most discrepancies can be resolved through the monthly reconciliation process.
- When FFM and Issuer financial fields do not match, Issuers must submit an enrollment dispute.
- When FFM and Issuer records match, but an unexpected payment discrepancy occurs, Issuers must submit a payment dispute.
- Payment disputes must be submitted for the following:
 - o An expected payment was not made
 - o A duplicate payment was made
 - o A PPR or 820 payment amount is not equal to the matching Pre-audit and Issuer amount.
 - For Partial Month Situations: A PPR or 820 payment amount is not equal to the Issuer amount and the pre-audit benefit start or end date matches the Issuer start or end dates.
- Issuers who identify enrollment discrepancies as a result of the PPR should submit an enrollment dispute using the existing dispute process.

Invalid Submissions

- Issuers should not submit a payment discrepancy dispute if any one of these is true:
 - o An Issuer does not receive a PPR or HIX 820 Payment Transaction.
 - o A discrepancy is an enrollment discrepancy dispute rather than a payment discrepancy dispute.
 - o A payment discrepancy dispute has already been reported for the payment coverage period.

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System Calendar

- System calendars are designed to help Issuers anticipate when relevant file processing events are scheduled to occur.
- System calendars include operational schedules for each calendar month.
- These calendars can be found on REGTAP, zONE, and in the Issuer Transition Guide.

Example System Calendar

Example: 2015 Policy Based Payments (PBP) Calendar Cycle

Sun	Mon	Tue	Wed	Thu	Fri	Sat
Oct 4	Oct 5	Oct 6	Oct 7	Oct 8	Oct 9	Oct 10
						PPR -->
Oct 11	Oct 12	Oct 13	Oct 14	Oct 15	Oct 16	Oct 17
<-- PPR				Cycle Cutoff		
Oct 18	Oct 19	Oct 20	Oct 21	Oct 22	Oct 23	Oct 24
	Pre-Audit extract	EPS load	Treasury Payment			
Oct 25	Oct 26	Oct 27	Oct 28	Oct 29	Oct 30	Oct 31
	Pre-Audit delivered		820			
Nov 1	Nov 2	Nov 3	Nov 4	Nov 5	Nov 6	Nov 7
Nov 8	Nov 9	Nov 10	Nov 11	Nov 12	Nov 13	Nov 14
		PPR				
Nov 15	Nov 16	Nov 17	Nov 18	Nov 19	Nov 20	Nov 21
Cycle Cutoff	Pre-Audit extract	EPS load			RCNI	Treasury Payment -->
Nov 22	Nov 23	Nov 24	Nov 25	Nov 26	Nov 27	Nov 28
<-- Treasury Payment						820 -->
	Pre-Audit delivered				RCNO	
Nov 29	Nov 30	Dec 1	Dec 2	Dec 3	Dec 4	Dec 5
<-- 820						

Updating Banking and Billing Information

Updates to Banking and Billing Information

- Issuers and CMS access to the Financial Management Application will be limited each month so that potential updates to vendor records will not change data incorporated in the monthly payment file as it transmits through the CMS accounting system.
- Starting in November, Issuers will be unable to access the Financial Management Module in the Health Insurance Oversight System (HIOS) from the 25th of every month through the 10th of the following month.
- A full list of unavailable and open dates through December 2015 are available on the next slide.

Updates to Banking and Billing Information

Dates	FM Module Unavailable/Open
November 5 – 20, 2015	FM Module unavailable (Currently in place)
November 21 – 24, 2015	FM Module open (Short open window for November)
November 25, 2015 – December 10, 2015	FM Module unavailable
December 11 – 24, 2015	FM Module open
December 25, 2015 – January 10, 2016	FM Module unavailable

Questions?

To submit questions by phone:

- *dial '14' on your phone's keypad*
 - *dial '13' to withdraw your question*

To submit questions by webinar:

- *type your question in the text box under the 'Q&A' tab*

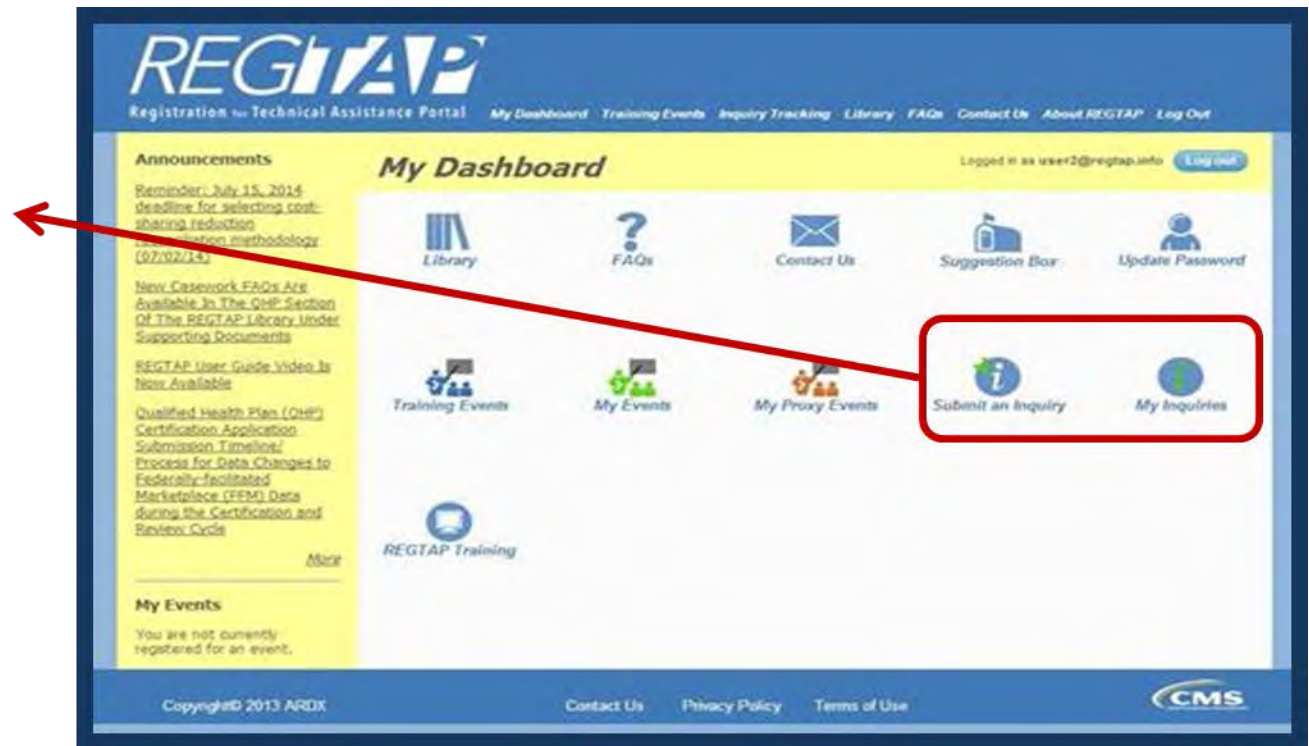
Resources

Resource	Resource Link
Centers for Medicare & Medicaid Services (CMS)	http://www.cms.gov/
U.S. Department of Health & Human Services	http://www.hhs.gov/
The Center for Consumer Information & Insurance Oversight (CCIIO) web page	http://www.cms.gov/ccio
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

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

My Dashboard



The FAQ Database allows users to search FAQs by FAQ ID, Keyword/Phrase, Program Area, Primary and Secondary Categories, and Publish Date.

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

FAQ Search

FAQ ID Enter numeric FAQ ID only

Keyword/Phrase

Program Area
Select All
Agent Broker
Distributed Data Collection for RI and RA/Edge Server
Enrollment and Eligibility
Event Registration and Logistics

Primary Category

Secondary Category

Publish Date
Start Date 22 End Date 22

Closing Remarks