



State-Based Exchange Payment Dispute

Technical Reference Guide

Contract Number: GS-10F-0579N

Task Order Number: HHSM-500-2017-0005G

Prepared by:

Cognosante LLC

3110 Fairview Park Dr, Suite 800 | Falls Church, VA 22042

Version 3.0

March 29, 2019

Revision History

Version	Date	Revision Owner	Description of Changes
3.0	03/29/2019	Cognosante	Updated content due to retirement of SR5 disposition code.
2.0	01/04/2019	Cognosante	Updated content to describe window for dispute submission that avoids re-dispositioning and Semi-Monthly Report
1.7	10/11/2018	Cognosante	Updated content to include re-dispositioning of non-rejected disputes against the latest EPS extract load in SBE dispute processing.
1.6	06/14/2018	Cognosante	Updates to Disposition and Detail Codes; updates to the Dispute Disposition Report
1.5	03/09/2018	Cognosante	Updated zONE links to SBE-related documentation; updated zONE links and sample file in Appendix F document
1.5	02/28/2018	Cognosante	Added Application ID to File Naming Convention (Table 10). Added sections 8.3 Dispute Submission Timing and 8.4 Persistent Disputes, as well as Appendix H. Updated Table 3 with correct report names and delivery dates. Added Figure 2, Sample Monthly Reporting Schedule. Made edits to section 8.5 Semi-Monthly Report. Updated Appendix F attachment with new report name. Edited to meet 508 compliance.
1.4	12/27/2017	Cognosante	Updated Appendices A, B and F with updated versions of each artifact. Changed references to dispute form submissions to allow Excel and PSV formats. Clarified Semi-Monthly Issuer Reports being specific to In Process dispositions that have changed. Made general updates to content and structure.
1.3	09/28/2017	Cognosante	Updated diagram of the file transfers between CMS, SBEs and Issuers. Updated Table 3 to clarify difference between Interim SBMR and Final SBMR files and added Payment Information Report (PNR). Removed Recurring Value from dispute form and updated all instances of the dispute form in the document including links, sample files and attachments.
1.2	09/11/2017	Cognosante	Updated Appendix F with a corrected Dispute Disposition Report Specification document.
1.2	09/07/2017	Cognosante	Updated Function Codes and File Naming Conventions that had incorrectly reverted to “SBE” but should remain “SBM.”
1.2	08/15/2017	Cognosante	Updated document to 1) change instances of SBE/Marketplace to SBE/Exchange, 2) update all instances of Dispute Form field name change from “EPS” to “PPR/HIX820” and 3) add report specification document.

Version	Date	Revision Owner	Description of Changes
1.2	07/25/2017	Cognosante	Updated document content based on feedback from CareFirst issuer with clarifying document verbiage and disposition code descriptions. Updated ER&R Support email address. Updated dispute form links.
1.1	05/30/2017	Cognosante	Updated document content based on feedback and suggested wording edits from CMS clients.
1.0	04/14/2017	Cognosante	Includes suggested edits and comments from the following reviewers: CMS client, Cognosante SMEs, Cognosante Process & Training
1.0	03/01/2017	Cognosante	Initial Document Draft

Table of Contents

1.0	Purpose	1
2.0	Background	1
3.0	High-Level Overview	1
3.1	State Based Exchange Payment Overview	2
3.2	SBE Payment Dispute Overview	2
4.0	Policy-Based Payment Process.....	3
4.1	CMS Data Validation	3
4.2	SBMI Response Files	3
4.3	CMS Monthly Payment Cycle.....	4
4.4	State Reconciliation.....	4
4.5	SBE Disputes Prerequisites and Processes	4
4.5.1	Establishing Electronic Data Interchange	4
4.5.2	Establishing CMS Electronic File Transfer	4
4.5.3	Testing Requirements	4
4.5.4	Access to zONE	4
4.5.5	State Based Exchange Payment Dispute Stakeholders	5
4.5.6	Files and Systems Relevant to SBE Payment Dispute Processes	5
5.0	SBE Payment Dispute Workbook.....	10
5.1	SBE Payment Dispute Workbook Worksheet Overview	10
5.1.1	SBE Payment Dispute Workbook: Instructions Worksheet	11
5.1.2	SBE Payment Dispute Workbook: Excel Example File Worksheet.....	11
5.1.3	SBE Payment Dispute Workbook: PSV Example File Worksheet.....	11
5.2	SBE Payment Dispute Form.....	12
5.2.1	SBE Payment Dispute Form Data Elements.....	12
6.0	Preparing an SBE Payment Dispute	20
6.1	Header Record	20
6.2	Detail Record.....	21
6.2.1	Disputable Fields	21
6.2.2	Non-Disputable Fields	21
6.3	Understanding Coverage Periods	22
6.4	Additional SBE Payment Dispute Form Guidance	22
7.0	Submitting an SBE Payment Dispute File	23
7.1	SBE Payment Dispute File Format.....	24
7.2	SBE Payment Dispute File Naming Convention.....	24
7.2.1	CMS EFT Function Code	24
7.3	CMS EFT Inbound Folder/Directory	24
7.4	File Receipt Acknowledgement.....	24

7.5	Processing Timeline	25
8.0	Understanding a Processed SBE Payment Dispute.....	25
8.1	Disposition and Detail Codes	25
8.2	PPR-820 Dispute Response File.....	26
8.2.1	Receiving the PPR-820 Dispute Response File	27
8.3	Timing of Disposition Reporting to Issuers and SBEs	28
8.4	Understanding Persistent Disputes	28
8.4.1	Re-submitted Persistent Disputes	29
8.4.2	Inferred Persistent Disputes	29
8.5	SBE Semi-Monthly Issuer Report	29
8.5.1	Receiving the SBE Semi-Monthly Issuer Report	30
9.0	SBE Support and Resources	31
9.1	ER&R Support Center.....	31
9.2	Additional Resources.....	31
Appendix A.	SBE Payment Dispute Form	32
Appendix B.	Disposition and Detail Code List	33
Appendix C.	SBE Payment Dispute – Complete File Examples	34
Appendix D.	SBE Payment Dispute Response File Example	35
Appendix E.	Semi-Monthly Issuer Report Example.....	36
Appendix F.	SBE Dispute Disposition Report Specifications	37
Appendix G.	SBE File Exchange Diagram.....	38
Appendix H.	Dispute Submission Timing Scenarios	39

List of Figures

Figure 1: Diagram of File Exchange between SBE, CMS, and Issuers	2
Figure 2: Sample Monthly Reporting Schedule.....	10
Figure 3: SBE Payment Dispute Workbook – Excel Example File Worksheet.....	11
Figure 4: SBE Payment Dispute Workbook – PSV Example File Worksheet	12
Figure 5: Header Record Example.....	21
Figure 6: Payment Dispute Exhibit – Single Dispute Record.....	22
Figure 7: Payment Dispute Exhibit – Distinct Records	22

List of Tables

Table 1: Payment Discrepancy Types.....	3
Table 2: SBE Payment Dispute Stakeholders	5
Table 3: State Based Exchange Payment Dispute Files and Systems.....	5

Table 4: SBE Payment Dispute Workbook – Worksheets.....	10
Table 5: SBE Payment Dispute Workbook – Instructions Worksheet	11
Table 6: SBE Payment Dispute Form Header Record Data Elements.....	12
Table 7: SBE Payment Dispute Form Detail Record Data Elements	14
Table 8: SBE Payment Dispute Form – Disputable Fields.....	21
Table 9: SBE Payment Dispute Form – Non-disputable Fields.....	22
Table 10: SBE Payment Dispute Form Guidance.....	23
Table 11: SBE Payment Dispute – File Naming Convention	24
Table 12: SBE Payment Dispute Disposition Codes	25
Table 13: PPR-820 Dispute Response File Additional Data Columns	26
Table 14: PPR-820 Dispute Response File – File Naming Convention	27
Table 15: SBE Semi-Monthly Issuer Report – CMS EFT Function Codes.....	30
Table 16: SBE Semi-Monthly Issuer Report – File Naming Convention.....	30

1.0 Purpose

This State-Based Exchange (SBE) Payment Dispute Technical Reference Guide (TRG) provides SBE issuers with a consolidated point of reference for technical guidance related to the SBE Payment Disputes process. This TRG includes the following:

- ▶ Policy-Based Payment (PBP) process information relevant to Payment Disputes
- ▶ Guidance on the identification of a payment discrepancy
- ▶ Technical and procedural guidance on the preparation, submission, and understanding of an SBE Payment Dispute

2.0 Background

Since the implementation of the Affordable Care Act (ACA) in 2014, several states have established health insurance exchanges as a means by which to offer health and dental insurance coverage options to their respective residents and small businesses. Individuals and small businesses within these states can compare and purchase coverage from a selection of health and dental plans, which are referred to as “Qualified Health Plan (QHP) policies”. Each SBE retains primary responsibility for establishing and overseeing QHPs and issuers.

The following states employ SBEs:

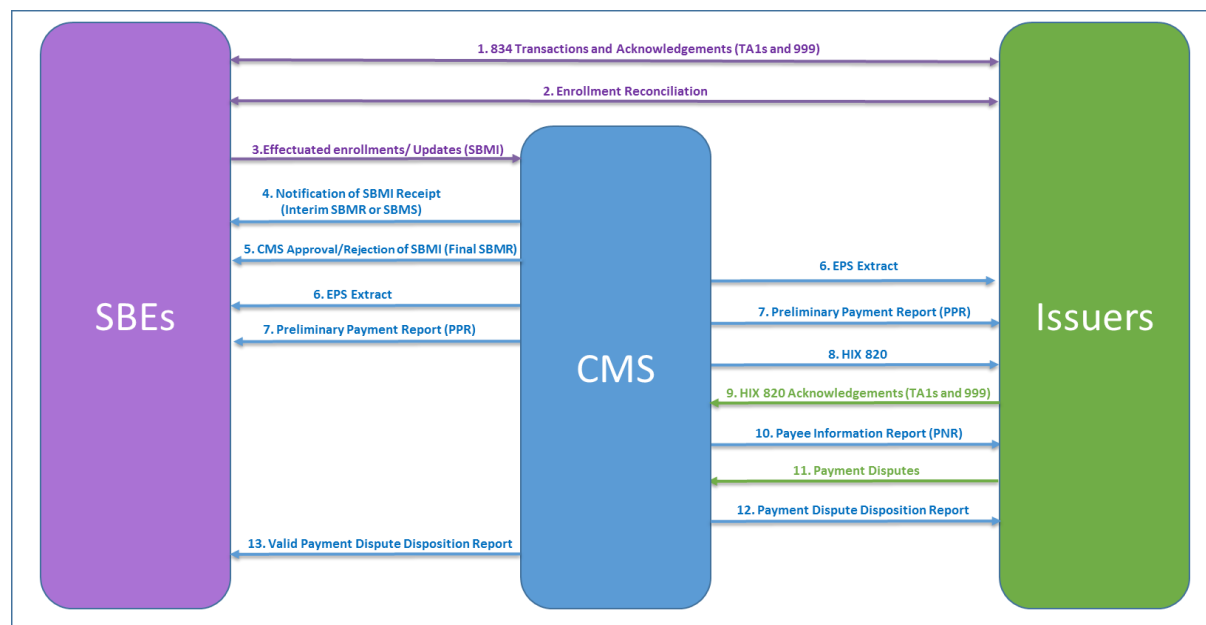
- ▶ California
- ▶ Colorado
- ▶ Connecticut
- ▶ District of Columbia
- ▶ Idaho
- ▶ Maryland
- ▶ Massachusetts
- ▶ Minnesota
- ▶ New York
- ▶ Rhode Island
- ▶ Vermont
- ▶ Washington

Consumers enrolled in these QHPs may be eligible for federal tax credits and Cost-Sharing Reductions (CSRs), which are subsidies based on the subscriber's income, to help pay for their health insurance and lower out-of-pocket costs. The Centers for Medicare & Medicaid Services (CMS) makes monthly payments to insurers for the consumers who receive these credits. CMS has established and instituted the SBE Payment Dispute process to allow SBE issuers to dispute discrepancies with the monthly payments as part of the Policy-Based Payment process.

3.0 High-Level Overview

Figure 1 shows a diagram of the files exchanged between SBEs, CMS, and the issuers.

Figure 1: Diagram of File Exchange between SBE, CMS, and Issuers



Refer to **Error! Reference source not found.** for a printable version of the SBE File Exchange diagram.

3.1 State Based Exchange Payment Overview

Consumers who qualify for advanced federal tax credits pay less than the full premium to issuers when they enroll in plans through an SBE. The consumer pays the difference of the full premium amount minus the federal tax credit. SBEs maintain enrollment records for each of the policies that are obtained on their exchange and transmit updated enrollment information to CMS on a monthly basis.

CMS uses the enrollment records to maintain a database of SBE enrollment data in the Enrollment and Payment System (EPS). CMS uses this database to calculate the monthly payment amounts to be distributed to SBE issuers based on their respective effectuated enrollments, enrollments for which consumers have paid the initial binder premium and thus have an active policy. In the month prior to remittance of the payments, a snapshot of the EPS database, called the EPS Extract, is generated and delivered to SBEs and their issuers to provide the detailed enrollment data on which the payments will be based.

CMS transmits the payment data to the U.S. Treasury and the U.S. Treasury makes payment directly to issuers each calendar month. CMS provides a Preliminary Payment Report (PPR) and a Health Insurance Exchange (HIX) 820 report with each payment cycle, which provide detailed payment data to help issuers understand the payments they are receiving.

3.2 SBE Payment Dispute Overview

Each month, SBE issuers compare their own detailed enrollment and payment data to the data sent by CMS in the PPR and HIX-820. If an issuer identifies discrepant payment amounts, the issuer can dispute those payments through the submission of the SBE Payment Dispute Form to CMS.

NOTE: A difference between SBE and issuer amounts of two cents or less, which could result from rounding, is not considered a discrepancy.

Table 1 describes the three types of payment discrepancies possible within the SBE Payment Dispute process.

Table 1: Payment Discrepancy Types

Payment Discrepancy Type	Definition
Missing Payment	Occurs when an issuer expects payment for an enrolled consumer, but no payment is received
Incorrect Payment	Occurs when an issuer received a payment, but the amount differs from the expected value
Unexpected Payment	Occurs when either: ▶ An issuer receives payment for a member they do not have enrolled ▶ An issuer did not expect to be paid for a policy, but a payment has been made

On behalf of CMS, the ER&R contractor accepts Payment Disputes through an automated process that analyzes the disputes using established business rules. A Payment Dispute response file, the Payment Dispute Disposition Report, is returned to the issuer to provide tracking information and the disposition, which describes the status, for each dispute. CMS also delivers an SBE Semi-Monthly Issuer Report to all SBE issuers that provides updated disposition codes, when applicable.

4.0 Policy-Based Payment Process

Accurate enrollment and payment data are fundamental to the Policy-Based Payment process. This section provides technical details for how the policy-level enrollment data is received and validated for payment processing.

4.1 CMS Data Validation

The SBE sends policy-level enrollment details to CMS for ingestion into the EPS using the SBE Incoming (SBMI) file. CMS validates and processes the SBE enrollment data at the policy level each month on a schedule that coordinates with the CMS monthly payment cycle. SBMI enrollment data that passes validation is used to calculate payments to SBE issuers.

4.2 SBMI Response Files

There are two types of response files that CMS may send to the SBE after receiving an SBMI file:

- ▶ **State Based Marketplace Response (SBMR):** This is a type of response file that is sent to the SBE after an individual SBMI file submission. It includes warnings or rejections that are encountered as the SBMI file is routed to the EPS for processing. There are two SBMR files the SBE will receive:
 - **Interim SBMR:** Sent to SBEs after the records in the SBMI are processed. It includes all policy-level errors and warnings and has an in-progress status.
 - **Final SBMR:** Sent to SBEs after CMS reviews and approves or denies the SBMI. This file reports the SBMI file processing summary information and final processing status of approval or rejection.
- ▶ **State Based Marketplace Status (SBMS):** This type of response file is sent when the SBMI file cannot be processed or the processing of the file is delayed. Once processing resumes, the SBE will receive an SBMR if the file can be processed.

4.3 CMS Monthly Payment Cycle

Monthly, issuers receive the PPR and HIX-820 reports, which describe the payments the issuers receive from CMS. The PPR is posted via the CMS Electronic File Transfer (EFT) between the 11th and 15th of the month, and the HIX-820 is posted via the EFT between the 28th and 30th of the month.

The PPR provides each issuer with a list of the policies for which CMS will send payments later that month. Following the EFT payment to issuers from the U.S. Treasury, the HIX-820 file arrives and includes the same policy details supplied in the PPR, excluding the individual policy's total premium amounts. Each month's payment includes prospective payment for policies active in the current month, plus any retroactive adjustments to previous months' payments.

4.4 State Reconciliation

Issuers engage in regular Policy-Based Payment processing activities with their SBE to confirm the accuracy of their enrollment data. In order to synchronize data across platforms, issuers collaborate with the SBE to analyze and resolve enrollment discrepancies.

4.5 SBE Disputes Prerequisites and Processes

Licensed issuers offering QHPs through an approved SBE where one or more of its consumers have qualified for a federal tax credit may submit SBE Payment Disputes if necessary. To successfully execute the SBE Payment Dispute process, the following is required:

- ▶ A completed CMS EFT Setup
- ▶ A completed Trading Partner Agreement (TPA)
- ▶ Access to zONE

4.5.1 Establishing Electronic Data Interchange

To send and receive EDI transactions, issuers and SBEs must do the following:

- ▶ Complete a trading partner agreement
- ▶ Be able to exchange profile information
- ▶ Establish connectivity to the Federal Data Services Hub (DSH) through CMS

4.5.2 Establishing CMS Electronic File Transfer

CMS uses EFT to send and receive files from issuers and other trading partners. The Enrollment Resolution & Reconciliation (ER&R) Support Center is responsible for retrieving dispute files from the EFT server. CMS will assign each issuer a Submitter Identifier in the EFT system, which allows access to a mailbox. The issuer and CMS (ER&R Contractor) use this mailbox to pick up and drop off dispute and response files. CMS and the Managed File Transfer (MFT) vendor who controls EFT routing complete the initial set-up process for the issuer in CMS EFT.

NOTE: If EFT is not established, it will result in file submission failure.

4.5.3 Testing Requirements

Testing prior to submitting a dispute file is not required. If the issuer wants to conduct testing, test file submission may be coordinated through the [ER&R Support Center](#).

4.5.4 Access to zONE

CMS [zONE](#) (zONE) is a social platform for organizations and individuals partnering and working with CMS. It is a secure, collaborative venue for states, issuers, business, and technology teams to connect, communicate, and share information such as documents, resources, and best practices.

Issuers should refer to the [CMS Enterprise Identity Management \(EIDM\) User Guide](#) to learn how to register in the CMS EIDM system and request access to zONE.

4.5.5 State Based Exchange Payment Dispute Stakeholders

Table 2 delineates the stakeholders involved in the SBE Payment Dispute processes.

Table 2: SBE Payment Dispute Stakeholders

Stakeholder	Definition
Centers for Medicare & Medicaid Services (CMS)	A federal agency which is responsible for Medicare and parts of Medicaid. CMS covers 100 million people through Medicare, Medicaid, the Children's Health Insurance Program (CHIP), and the Health Insurance Marketplace.
Center for Consumer Information and Insurance Oversight (CCIIO)	CCIIO is a division of CMS and is charged with helping implement reforms of the Affordable Care Act (ACA). CCIIO oversees the implementation of the provisions related to private health insurance. CCIIO is working with states to establish new Health Insurance Marketplaces.
Consumer	A consumer is either: ▶ A person who seeks information related to eligibility or coverage through a QHP or other Insurance Affordability Program for themselves or on behalf of another individual ▶ A person whom an agent or broker (including Web-brokers), Navigator, issuer, Certified Application Counselor, or other entity assists in applying for coverage through a QHP; applying for Advance Premium Tax Credits (APTCs) and Cost-Sharing Reductions (CSRs); and/or completing enrollment in a QHP through its web site for individual market coverage
Enrollment Resolution & Reconciliation (ER&R) Contractor	The ER&R Contractor, on behalf of CCIIO, facilitates SBE financial payment correction by executing the SBE Payment Dispute process.
Issuer	Issuer or Qualified Health Plan (QHP) issuer means an insurance company, insurance service, or insurance organization (including an HMO) that is required to be licensed to engage in the business of insurance in a State and that is subject to State law that regulates insurance.
State-Based Exchange (SBE)	A state-operated Marketplace where consumers and small businesses have access to shop for and buy Qualified Health Plans (QHP) policies.

4.5.6 Files and Systems Relevant to SBE Payment Dispute Processes

Table 3 describes the systems, files, reports, and/or documents pertinent to the SBE Payment Dispute processes.

Table 3: State Based Exchange Payment Dispute Files and Systems

System/File	Content	Purpose	Frequency	Originator	Audience
Enrollment and Payment System (EPS) database	▶ Primary CMS Payment Database	▶ Stores SBE enrollments, validates and ingests the SBMI data then produces the EPS extract output file	N/A	CMS	N/A

System/File	Content	Purpose	Frequency	Originator	Audience
Enrollment and Payment System (EPS) Extract Output File	▶ Most recent SBE enrollment information submitted to and approved by CMS within the EPS database prior to the payment cycle cutoff – 15th of each month ▶ Sent in XML format	▶ CMS uses the updated data in the EPS to generate the Preliminary Payment Report (PPR) and the HIX-820 file ▶ Includes information about policy-level errors or warnings generated from the SBMI files received since the previous EPS Extract where a policy was not changed by a subsequent SBMI ▶ Sent to issuers one month before payments are processed	Monthly: around the 18th to 20th	CMS	SBEs, Issuers
HIX-820 Remittance Advice File	▶ Policy-level payment details provided after issuers are paid ▶ Sent in X12 format	▶ Used as a basis for a Payment Dispute to CMS ▶ Includes official amounts of APTC and advance CSR payments made for policy-based payments from the U.S. Treasury	Monthly: end-month	CMS	Issuers
Payee Information Report (PNR)	▶ Includes all current cycle accounts payable and accounts receivable ▶ Sent in pipe-separated value (PSV) format	▶ Provides payees a snapshot of the payment cycle netting that occurs until the HIX 820 report is delivered at end of month	Monthly; mid-month	CMS	Issuers

System/File	Content	Purpose	Frequency	Originator	Audience
Preliminary Payment Report (PPR)	▶ Policy-level payment details provided before issuers are paid ▶ Sent in PSV format	▶ Used as a basis for a Payment Dispute to CMS ▶ This information should align with the enrollment data on the enrollment and payment system (EPS) Extract sent in the previous month ▶ Provides each issuer with a list of the policies for which CMS will send payments later that month	Monthly: mid-month	CMS	SBEs, Issuers
PPR-820 Dispute Response File (Disposition Report)	▶ Payment dispute disposition ▶ Sent in PSV format	▶ Provides information about a dispute file submission after it has been processed including CMS Dispute Control Numbers, dispositions and detail codes	Within 1 business day of submission of form	CMS, ER&R Contractor	Issuers
Rejected Files	▶ Notifies issuers that a Payment Dispute file was too impaired to process	▶ ER&R Contractor tells the issuer that the Payment Dispute file is not well formed and cannot be processed	Within 1 business day of submission of form	ER&R Contractor	Issuers
Semi-Monthly Issuer Report	▶ Updates to Payment Disputes disposition codes previously assigned since the last Semi-Monthly Issuer Report ▶ Sent in two formats – Excel and PSV	▶ Provides updated dispositions for Payment Disputes ▶ First time disposition codes will NOT appear on this report	Monthly: 1st, 16th	CMS, ER&R Contractor	Issuers

System/File	Content	Purpose	Frequency	Originator	Audience
State Based Exchange Payment Dispute Workbook	▶ Used in the process in which issuers submit a Payment Dispute ▶ A file schema in Excel defining the format, syntax and structure for a payment discrepancy ▶ Payment Dispute may be sent in either PSV or .xls/.xlsx format	▶ Issuers must use this format to create disputes for any missing, incorrect or unexpected APTC, and advance CSR payments received from CMS ▶ Allows issuers to identify missing payments and to dispute coverage start date and end date, total premium, APTC amount, and advance CSR amount for any payment they receive ▶ Disputes must reference a specific PPR or HIX-820	Disputes may be submitted at any time	Issuer	CMS
State Based Exchange Incoming (SBMI)	▶ Policy-level enrollment data submitted by the SBE to CMS ▶ Sent in XML format	▶ CMS validates the enrollment data using set business rules ▶ Valid enrollments are used to calculate policy-based payments (PBP)	Expected to CMS on the 1st of the month Monthly submission cut-off is the 10th of the month Updates may be submitted at any time	SBEs	CMS
State Based Exchange Response – Interim (Interim SBMR)	▶ Notifies SBEs that an SBMI file has been received and includes all policy-level errors and warnings and has an in-progress status ▶ Sent in XML format	▶ Errors and warnings generated by EPS depicting outcome of business rules processing of the SBMI	Updates may be sent at any time as SBMIs are processed	CMS	SBEs

System/File	Content	Purpose	Frequency	Originator	Audience
State Based Exchange Response – Final (Final SBMR)	▶ Reports to SBEs when CMS approves or rejects the SBMI ▶ Sent in XML format	▶ This file reports the SBMI file processing summary information and final processing status of approval or rejection	Updates may be sent at any time as SBMIs are processed	CMS	SBEs
State-based Marketplace Status (SBMS)	▶ Notifies SBEs that an SBMI file has been received and file cannot be processed, or the processing of the file is delayed ▶ Sent in XML format	▶ CMS tells the SBE if the SBMI is not well formed, fails file level schema validation, fails file information validation, or will be delayed in processing	Updates may be sent at any time as SBMIs are processed	CMS	SBEs
SBE Dispute Disposition Report, with Persistent Dispute Details (DDR+)	▶ Report in the format of the Disposition Report that includes only Valid Disputes, which is every dispute except those with Reject dispositions ▶ Includes three additional fields at end of each record to identify persistent disputes	▶ To encourage data reconciliation efforts between issuers and their SBE to ensure SBMI data sent to EPS accurately depicts consumer enrollment data with additional emphasis on policies that have been disputed in previous month	Monthly: first business day of each month	CMS, ER&R Contractor	SBEs
CMS generates additional reports that track data consistency	N/A	N/A	N/A	N/A	N/A

Figure 2: Sample Monthly Reporting Schedule



5.0 SBE Payment Dispute Workbook

The SBE Payment Dispute Workbook contains several worksheets for issuers to use and reference when generating dispute files. The workbook contains the SBE Payment Dispute Form as well as instructional worksheets to assist issuers with completing the form.

5.1 SBE Payment Dispute Workbook Worksheet Overview

Table 4 describes the worksheets that comprise the SBE Payment Dispute Workbook.

Table 4: SBE Payment Dispute Workbook – Worksheets

SBE Dispute Form Worksheet	Contents
Revision History	▶ Revision/Version ▶ Author ▶ Date ▶ Notes, which summarize the updates per revision
Instructions	▶ Field-specific definitions ▶ Form completion guidance ▶ Form submission guidance
Excel Format	Payment Dispute Form in Excel format
Excel Example File	A depiction of sample Payment Disputes in an Excel format
Pipe-Separated Value (PSV) Example File	A depiction of sample Payment Disputes in PSV format

5.1.1 SBE Payment Dispute Workbook: Instructions Worksheet

The Instructions worksheet contains guidance on how to complete and submit a Payment Dispute.

Table 5 provides an overview of the Instructions worksheet.

Table 5: SBE Payment Dispute Workbook – Instructions Worksheet

Instruction Section	Description
General Form Guidance	Overview of how issuers should use the form, explanation of the disputable fields, options of reporting a dispute, and things to consider when completing the form
Form Submission Guidance	Overview of how to submit the form, file naming convention, ER&R contact information for assistance with completing the form, and additional notes to consider
Field Specific Details	A breakdown of each field contained within the Dispute Form (header, header response, detail, and response). Within each section, each field includes the following definitions: ► Description of the field ► Expected format of the value for that field ► PPR or HIX-820 related data element ► Example of the expected value ► Minimum field size ► Maximum field size ► Whether field is required or situational ► Comments to further clarify the field

5.1.2 SBE Payment Dispute Workbook: Excel Example File Worksheet

Figure 3 is a partial example of a completed SBE Payment Dispute in the Excel format. The Excel Example File worksheet of the SBE Payment Dispute Workbook contains the complete example. This example is provided to demonstrate how a dispute is completed manually.

Figure 3: SBE Payment Dispute Workbook – Excel Example File Worksheet

1	File_Control_Number	C12345678					
2	Point_of_Contact_Name	John Smith					
3	Point_of_Contact_Telephone_Number	8001111234EXT849204					
4	Point_of_Contact_Email_Address	johnsmith@company.com					
5	Date_Submitted	20170216					
6	Time_Submitted	162055					
7	PPR_Transaction_Set_Control_Number	000004930					
8	HIX_820_EFT_Trace_Number						
9	Payee_ID	A000009					
10	Issuer_[HIOS]_ID	Issuer_Assigned_Dispute_Control_Number	Exchange_Assigned_Subscriber_ID	Exchange_Assigned_Policy_ID	Payment_Cycle_Month	Issuer_Assigned_Subscriber_ID	Issuer_Assigned_Policy_ID
11	12345	ABC123456789	0001503934	56291448	201702	492616725	693816725
12	12345		0001503935	56291448	201702		
13	12345		0001503935	14485629	201702		
14	12345		0001503936	29144856	201702		
15	12345	ABC123456789	0001503934	56291448	201702	492616725	693816725
16							
17							

5.1.3 SBE Payment Dispute Workbook: PSV Example File Worksheet

Figure 4 is an example of a completed SBE Payment Dispute in the PSV format. This example can be found under the PSV Example File worksheet of the SBE Payment Dispute Workbook.

Figure 4: SBE Payment Dispute Workbook – PSV Example File Worksheet

1	C12345678 JohnSmith 8001111234EXT849204 johnsmith@company.com 20170201 162055 000004930 A000009
2	12345 ABC123456789 0001503934 56291448 201702 492616725 693816725 20170201 20170210 20170228 20170227 4022.35 2534.50 513.48 234.06 174.59 90.48 N
3	12345 0001503935 56291448 201702 20170201 20170201 20170228 20170228 1200.00 1200.00 513.48 234.06 CA213555000
4	12345 0001503935 56291448 201702 20170201 20170201 20170228 20170228 1050.00 1050.00 523.48 244.06
5	12345 0001503936 29144856 201702 20170201 20170228 900.00 475.00 90.00
6	12345 ABC123456789 0001503934 56291448 201702 492616725 693816725 20170201 20170201 20170228 20170228 4022.35 2534.50 513.48 234.06 174.59 90.48 2017-SBM-00007 V 5999999 2017-SBM-00001
7	

5.2 SBE Payment Dispute Form

The SBE Payment Dispute Form is located on the Excel Format worksheet of the workbook. This form is the template that SBE issuers should use as a specification for creating Payment Dispute files. Issuers send the dispute file to the ER&R Contractor with details of the discrepant payment amounts to be resolved.

Issuers should access the most recent version of the SBE Payment Dispute Workbook on CMS zONE:

<https://zone.cms.gov/document/issuer-dispute-form>

NOTE: Disputes submitted on obsolete versions or invalid forms will be rejected.

5.2.1 SBE Payment Dispute Form Data Elements

Table 6 provides descriptions of each data element in the SBE Payment Dispute Form and the following additional information:

- ▶ File specifications for PSV and .xls/.xlsx submissions, including key details such as field length requirements and whether the field is required or situational
- ▶ Example data sets
- ▶ Instructions indicating situational fields under the Comments column

NOTE: The Instructions tab of the SBE Payment Dispute Form also contains the content shown in the following tables.

Table 6 describes the contents of the header record.

Table 6: SBE Payment Dispute Form Header Record Data Elements

Field Number and Description	Format	PPR/HIX 820 Mapping	Example	Field Length	Comments
H1: File Control Number (issuer) File Control Number the issuer assigned to the file	Any American Standard Code for Interchange (ASCII) characters, except a vertical pipe (i.e.,)	N/A	C12345678	1-50	This is a required field.
H2: Point of Contact Name The first and last name of contact person that CMS may reach out to, to discuss the Dispute Form	Any ASCII characters, except a vertical pipe (i.e.,)	N/A	John Smith	1-50	This is a required field.

Field Number and Description	Format	PPR/HIX 820 Mapping	Example	Field Length	Comments
H3: Point of Contact Telephone Number Telephone number and extension of point of contact	Must contain groups of 3 digits, 3 and 4 digits, and may contain extension details. Issuers may use any delimiters around these digits	N/A	Without Extension: 8001111234 With Extension: 8001111234 EXT849204	10-50	This is a required field.
H4: Point of Contact Email Address Email address of point of contact	Any ASCII characters, except a vertical pipe (i.e.)	N/A	johnsmith@company.com	1-256	This is a required field.
H5: Date Submitted Date form was submitted to ER&R	YYYYMMDD	N/A	20170101	8-8	This is not a required field. Must be a valid date.
H6: Time Submitted Time form was submitted to ER&R	HHMMSS	N/A	162055	6-6	This is a situational field. Must include one of the following: ► PPR Transaction Set Control Number ► HIX 820 EFT Trace Number
H7: PPR Transaction Set Control Number PPR Transaction Set Control Number used to uniquely identify the PPR	Numeric	Element B1 on PPR Schema	4930	2-20	This is a situational field. Must include one of the following: ► PPR Transaction Set Control Number ► HIX 820 EFT Trace Number

Field Number and Description	Format	PPR/HIX 820 Mapping	Example	Field Length	Comments
H8: HIX-820 EFT Trace Number HIX-820 EFT Number used to uniquely identify the HIX-820	Alphanumeric	Element TRN02 in Header on HIX-820	7439245	2-20	This is a situational field. Must include one of the following: ▶ PPR Transaction Set Control Number ▶ HIX 820 EFT Trace Number
H9: Payee ID Payee Identifier setup during Vendor Management registration process	Alphanumeric – The letter "A" followed by 6 or 7 digits	Element B3 on PPR Schema Element GS03 in Header on HIX-820	A000009	7-8	This is not a required field.

Table 7 describes the contents of the detail record.

Table 7: SBE Payment Dispute Form Detail Record Data Elements

Field Number and Description	Format	PPR/HIX 820 Mapping	Example	Field Length	Comments
F1: Issuer Health Insurance Oversight System (HIOS) ID HIOS issuer ID uniquely identifies the issuer assigned by CMS	Numeric	Column A in record detail of PPR Schema (labelled “Issuer ID”) Element REF02 in 2100 Loop on HIX-820 (first 5 digits of QHP ID), when REF01=38	12345	5-5	This is a required field.

Field Number and Description	Format	PPR/HIX 820 Mapping	Example	Field Length	Comments
F2: Issuer Assigned Dispute Control Number Issuers may assign a unique identifying Control Number to each dispute in order to track it over time. CMS will provide this Control Number on the Resolution Report sent back to the issuers.	Any ASCII characters, except a vertical pipe (i.e.,)	N/A	ABC123456789	1-50	This is not a required field.
F3: Exchange Assigned Subscriber ID Exchange Assigned Subscriber ID assigned by SBE	Alphanumeric	Column J on PPR Schema Element NM109 in 2100 Loop on HIX-820	0001503934	1-50	This is a required field.
F4: Exchange Assigned Policy ID Exchange Assigned Policy ID assigned by SBE	Alphanumeric	Column L on PPR Schema Element REF02 in 2100 Loop on HIX-820, when REF01=POL	56291448	1-50	This is a required field.

Field Number and Description	Format	PPR/HIX 820 Mapping	Example	Field Length	Comments
F5: Payment Cycle Month Enter one of the following to show which file the issuer used to report the discrepancy: ▶ PPR: Policy-Based Transition Month used to identify the Payment Month Year the PPR corresponds to ▶ HIX-820: EFT Effective Date used to identify the corresponding HIX-820 Payment Month and Year	YYYYMM	Issuers locate these numbers in Element B5 on PPR Schema or Element BPR16 in Header on HIX-820	201701	6-6	This is a required field.
F6: Issuer Assigned Subscriber ID Subscriber ID assigned by the issuer	Any ASCII characters, except a vertical pipe (i.e.)	Column N on PPR Schema Element REF02 in 2100 Loop on HIX-820, when REF01=0F	492616725	1-50	This is not a required field.
F7: Issuer Assigned Policy ID Policy ID assigned by the issuer	Any ASCII characters, except a vertical pipe (i.e.)	Column M on PPR Schema Element REF02 in 2100 Loop on HIX-820, when REF01=AZ	693816725	1-50	This is not a required field.
F8: Coverage Period Start Date (PPR/HIX-820) Coverage Period Start Date from the specific file (PPR or HIX-820) sent from CMS, used to report the discrepancy	YYYYMMDD	Column Ton PPR Schema Element DTM06 in 2300 Loop on HIX-820 (1st eight characters)	20170101	8-8	This is a situational field. Issuers must include this date for any record that has a PPR/HIX-820 dollar amount value populated.

Field Number and Description	Format	PPR/HIX 820 Mapping	Example	Field Length	Comments
F9: Coverage Period Start Date (Issuer) Coverage Period Start Date from the issuers records for the specific period	YYYYMMDD	N/A	20170110	8-8	This is a situational field. Issuers must include this date for any record that has an issuer dollar amount value populated.
F10: Coverage Period End Date (PPR/HIX-820) Coverage Period End Date from the specific file (PPR or HIX-820) sent from CMS, used to report the discrepancy.	YYYYMMDD	Column U on PPR Schema Element DTM06 in 2300 Loop on HIX-820 (last eight characters)	20170131	8-8	This is a situational field. Issuers must include this date for any record that has a PPR/HIX-820 dollar amount value populated.
F11: Coverage Period End Date (Issuer) Coverage Period End Date from the issuer's records for the specific period	YYYYMMDD	N/A	20170128	8-8	This is a situational field. Issuers must include this date for any record that has an issuer dollar amount value populated.
F12: Policy Total Premium Amount (PPR/HIX-820) Policy Total Premium Amount from the PPR sent from CMS. Policy Total Premium Amount does not appear on the HIX-820.	Numeric (with optional decimal point). Do not include \$ symbol. Do not include commas to separate digit groupings.	Element O11 on PPR Schema Element Not Provided on HIX-820	4022.35	1-38	This is not a required field.

Field Number and Description	Format	PPR/HIX 820 Mapping	Example	Field Length	Comments
F13: Policy Total Premium Amount (Issuer) Policy Total Premium Amount from the issuer's records for the specific coverage period	Numeric (with optional decimal point). Do not include \$ symbol. Do not include commas to separate digit groupings.	N/A	2534.5	1-15	This is not a required field.
F14: APTC Amount (PPR/HIX-820) APTC Amount from the specific file (PPR or HIX-820) sent from CMS, used to report the discrepancy.	Numeric (with optional decimal point). Do not include \$ symbol. Do not include commas to separate digit groupings.	Reference Column P on PPR Schema for Payment Type of APTC and Column Q on PPR for Payment Amount. Reference Element RMR02 in 2300 Loop on HIX-820 for Payment Type of APTC and RMR04 in 2300 Loop on HIX-820 for Payment Amount.	513.48	1-15	This is not a required field.
F15: APTC Amount (Issuer) APTC Amount from the issuer's records for the specific period	Numeric (with optional decimal point). Do not include \$ symbol. Do not include commas to separate digit groupings.	N/A	234.06	1-15	This is not a required field.

Field Number and Description	Format	PPR/HIX 820 Mapping	Example	Field Length	Comments
F16: CSR Amount (PPR/HIX-820) CSR Amount from the specific file (PPR or HIX-820) sent from CMS, used to report the discrepancy.	Numeric (with optional decimal point). Do not include \$ symbol. Do not include commas to separate digit groupings.	Reference Column P on PPR Schema for Payment Type of CSR and Column Q on PPR for Payment Amount Reference Element RMR02 in 2300 Loop on HIX-820 for Payment Type of CSR and RMR04 in 2300 Loop on HIX-820 for Payment Amount	174.59	1-15	This is not a required field.
F17: CSR Amount (Issuer) CSR Amount from the issuer's records for the specific period	Numeric (with optional decimal point). Do not include \$ symbol. Do not include commas to separate digit groupings.	N/A	90.48	1-15	This is not a required field.
F18: Reserved Reserved for future use				0-0	This is not a required field. Do not populate this field for SBE Payment Disputes.
F19: Reserved Reserved for future use				0-0	This is not a required field. Do not populate this field for SBE Payment Disputes.

Field Number and Description	Format	PPR/HIX 820 Mapping	Example	Field Length	Comments
F20: SBE Reference Number State specific SBE related reference for a case number, tracking system number or similar reference number.	Any ASCII characters, except a vertical pipe (i.e.)	N/A	2017-SBE-00001	1-25	This is not a required field.
F21: Reserved Reserved for future use				0-0	This is not a required field. Do not populate this field for SBE Payment Disputes.
F22: Existing CMS Dispute Control Number Enter the number of another CMS case for the same Exchange Assigned Subscriber ID, if the issuer is aware one exists.	Alphanumeric – The letter "S" followed by 10 digits	N/A	S999999999	11-11	This is a situational field. Required, if applicable and known
F23: Comments Enter any supporting comments that may assist CMS to resolve the dispute.	Any ASCII characters, except a vertical pipe (i.e.)	N/A	2017-SBE-00002	1-255	This is a situational field.

6.0 Preparing an SBE Payment Dispute

The SBE Payment Dispute Workbook is available for issuer use in an Excel format, as described Section 5. A completed SBE Payment Dispute file that is ready for submission must contain a single header record and one or more detail records.

NOTE: The data fields highlighted in red within the SBE Payment Dispute Form are intended for CMS use only.

6.1 Header Record

The header record is the first record issuers supply in an SBE Payment Dispute Form. Data supplied in the header record fields is applicable to all detail records in the dispute. See Table 8 for details of the header record fields.

Since the header record groups all of the detail records by Payee ID, a single SBE Payment Dispute file may contain disputes for more than one Health Insurance Oversight System (HIOS) ID. Issuers have the option to submit a separate Payment Dispute file for each HIOS ID. If an issuer chooses to submit a separate Payment Dispute file for each HIOS ID, that issuer will receive separate Payment Dispute Response files for each HIOS ID.

Figure 4 is an example header record.

Figure 5: Header Record Example

File_Control_Number	C12345678
Point_of_Contact_Name	John Smith
Point_of_Contact_Telephone_Number	8001111234EXT849204
Point_of_Contact_Email_Address	johnsmith@company.com
Date_Submitted	20170201
Time_Submitted	162055
PPR_Transaction_Set_Control_Number	000004930
HIX_820_EFT_Trace_Number	
Payee_ID	A000009

6.2 Detail Record

Detail records are composed of 23 fields. Issuers use these fields to supply information pertinent to each individual dispute being submitted, including SBE and issuer subscriber identifiers, coverage period details, and financial data. See Table 6 describes the contents of the header record.

Table 6 for details of detail record fields.

6.2.1 Disputable Fields

Table 8 describes disputable fields as found in the Excel Format worksheet of the SBE Payment Dispute form. Issuers may dispute one or more fields using the Dispute Form.

Table 8: SBE Payment Dispute Form – Disputable Fields

Disputable Fields	Fields with PPR/HIX-820 Value	Fields with Issuer Value
Date Field: Coverage Period Start Date	Column H	Column I
Date Field: Coverage Period End Date	Column J	Column K
Dollar Amount Field: Total Premium Amount	Column L	Column M
Dollar Amount Field: APTC Amount	Column N	Column O
Dollar Amount Field: CSR Amount	Column P	Column Q

6.2.2 Non-Disputable Fields

Table 9 describes non-disputable fields as found in the Excel Format worksheet of the SBE Payment Dispute form.

Table 9: SBE Payment Dispute Form – Non-disputable Fields

Non-Disputable Fields	Location
Exchange Assigned Subscriber ID	Column C
Exchange Assigned Policy ID	Column D

The ER&R Contractor must be able to match disputes to a record on the PPR or HIX-820 in order to successfully process a dispute. Issuers must maintain these required fields in their own systems so that they can be included in dispute file submissions.

6.3 Understanding Coverage Periods

Issuers receive payments for units of enrollment that typically correspond to an entire month of member enrollment. The SBE Payment Dispute form has four disputable fields for dates: a pair (Coverage Period Start Date and Coverage Period End Date) for PPR/HIX-820 dates and a pair for issuer dates.

Individual disputes should never exceed a single calendar month, the maximum date range for which a payment is associated. If preferred, issuers can submit a Payment Dispute for each coverage month a member was enrolled, although this is not necessary since the dispute resolution process considers the entire enrollment period for the disputed policy.

NOTE: When submitting a dispute, issuers should supply the Coverage Period Start and Coverage Period End Dates for the disputed policy for the specific coverage month in dispute. The Coverage Period Start Date cannot be a date before the Policy Start Date; likewise, the Coverage Period End Date cannot be later than the Policy End Date.

6.4 Additional SBE Payment Dispute Form Guidance

If issuers find that a policy has one or more values to dispute, there are two options for completing the SBE Payment Dispute Form:

1. Fill in PPR/HIX-820 and issuer values for all disputable fields in a single dispute record
2. Fill in PPR/HIX-820 and issuer values for each disputable field in a separate dispute record

Figure 6 shows an excerpt of the SBE Payment Dispute Form in which the Coverage Period Start Date and Policy Total Premium Amount are being disputed, as the PPR/HIX-820 and issuer values for the respective columns are different. As shown, more than one disputable value can be disputed in a single record.

Figure 6: Payment Dispute Exhibit – Single Dispute Record

Issuer_(HIOS)_ID	Exchange_Assigned_Subscriber_ID	Exchange_Assigned_Policy_ID	Payment_Cycle_Month	Coverage_Period_Start_Date_(PPR/HIX820)	Coverage_Period_Start_Date_(Issuer)	Coverage_Period_End_Date_(PPR/HIX820)	Coverage_Period_End_Date_(Issuer)	Policy_Total_Premium_Amount_(PPR/HIX820)
12345	0001503934	56291448	201702	20170201	20170210	20170228	20170228	4022.35

Alternatively, issuers have the option to dispute values separately. Figure 7 shows an excerpt of the SBE Payment Dispute Form in which the Coverage Period Start Date and Policy Total Premium Amount are disputed in distinct dispute records.

Figure 7: Payment Dispute Exhibit – Distinct Records

Issuer_(HIOS)_ID	Exchange_Assigned_Subscriber_ID	Exchange_Assigned_Policy_ID	Payment_Cycle_Month	Coverage_Period_Start_Date_(PPR/HIX820)	Coverage_Period_Start_Date_(Issuer)	Coverage_Period_End_Date_(PPR/HIX820)	Coverage_Period_End_Date_(Issuer)	Policy_Total_Premium_Amount_(PPR/HIX820)	Policy_Total_Premium_Amount_(Issuer)
12345	0001503934	56291448	201702	20170201	20170210	20170228	20170228		
12345	0001503935	56291448	201702	20170201	20170210	20170228	20170228	4022.35	2534.50

Appendix C: SBE Payment Dispute – Complete File Examples includes a reproduction of the Excel Example File worksheet in the SBE Payment Dispute Form and lists five sample disputes. Four of the

examples have multiple fields in dispute for incorrect payments, and one row, Excel row 15, shows an example of an unexpected Payment Dispute.

Appendix C: SBE Payment Dispute – Complete File Examples also contains a table that illustrates how the disputes in the corresponding Excel Example File worksheet would appear as a PSV dispute file. The left column designates which Excel row(s) is illustrated by the sample data in the right column.

Table 10 provides further guidance on completing the SBE Payment Dispute Form.

Table 10: SBE Payment Dispute Form Guidance

Type	Dispute Form Guidance
Disputing Multiple Fields	Issuers may dispute multiple fields from the same policy on the same record or on separate records.
Date Exclusions	The Dispute Form requires both the PPR/HIX-820 dates and issuer dates, unless: ▶ A payment is missing from the PPR/HIX-820: exclude PPR/HIX-820 dates ▶ A payment is unexpected per the issuer's system: exclude issuer dates
Dollar Amount Field NOT in Dispute	If a dollar amount field is not in dispute, the PPR/HIX-820 values and issuer values on the Dispute Form shall be identical. For example: ▶ Left Blank ▶ Zero or Zero Amount (e.g., 0 or 0.00) ▶ Matching Amount: an identical non-zero value
PPR/HIX-820 Dates/Amounts should match PPR/HIX-820	Populate the form with the PPR/HIX-820 dates and amounts reported in the PPR or HIX-820 (see the PPR/HIX-820 mapping column in Table 7 for specific data sourcing guidance).
Populating the Date Range in the Dispute Form	The date fields shall represent the coverage month in dispute. The date fields shall not represent the benefit coverage dates. For example: ▶ Policy active – January through May ▶ Dispute – March payment ▶ Correct date fields: March 1st – March 31st ▶ Incorrect date fields: January 1st – May 31st
Partial Coverage Months	For partial coverage months, the dispute record should show APTC and CSR amounts in concordance with the proration methodology used by the SBE in which the issuer operates.
Missing Payment	If a payment is missing from the PPR or HIX-820, populate all PPR/HIX-820 disputable fields as blank or zero.
Unexpected Payment	If a payment is present in the PPR/HIX-820 (as reported in either the PPR or HIX-820) but unexpected per the data in the issuer's system, complete the form with all issuer disputable fields blank or zero.
Value is Missing in the Data Source	If a value is missing in the data source, populate all PPR/HIX-820 and issuer disputable fields as blank or zero to indicate this field is in dispute.
SBE Proration Rules for Partial Month Coverage	Follow current SBE proration rules for a mid-month change or a prorated APTC Amount. The dispute system will ensure the requested APTC amount matches the amount claimed in the SBMI process.

7.0 Submitting an SBE Payment Dispute File

Issuers may submit an SBE Payment Dispute file at any time. The dispute file may contain one or more policies in dispute for a respective Payer ID. Issuers will receive an acknowledgement email when the files have been successfully transmitted.

7.1 SBE Payment Dispute File Format

Issuers should use this form to submit disputes that appear to affect their policy-based payments (PBP). Issuers may identify discrepancies between the details reported by the Enrollment and Payment System (EPS) on either the Preliminary Payment Report (PPR) or the HIX 820 and the details in their own system as reported to EPS by the SBE in the monthly enrollment input (SBMI) file. Issuers may submit dispute files in either Excel or PSV format.

NOTE: For PSV file submissions, do not include leading pipes or trailing pipes on any of the dispute records, as the automated system will reject these files.

7.2 SBE Payment Dispute File Naming Convention

Issuers should use the file naming convention that is detailed in Table 11 to submit SBE Payment Dispute files via CMS EFT.

Table 11: SBE Payment Dispute – File Naming Convention

File Naming Convention	Definition
File Name Structure Example	TPID.COG.ERRSBM.Dyymmdd.Thhmmssmmm.P.IN
TPID	Issuer's Trading Partner ID (TPID), also known as the 'Source ID'
COG	Application ID
ERRSBM	ER&R Contractor Function Code for SBE disputes
Dyymmdd	Date Stamp, D is static text where yy is year, mm is month, dd is day
Thhmmssmmm	Time Stamp, T is static text where hh is hours, mm is minutes, ss is seconds, and mmm is milliseconds
P	Production Environment <i>Note: SBE Disputes should never use a different extension including when the SBE is operating in Prod-R.</i>
IN	Direction of data flow (Inbound to CMS), defaulted to "IN"

NOTE: Server outages may prevent and/or delay the submission of a dispute file submitted via the EFT server; however, there are no timeframe restrictions on the submission of disputes.

7.2.1 CMS EFT Function Code

Function Codes are used to properly and automatically route files to the responsible receiving entity. ERRSBM is the established SBE Payment Dispute CMS EFT Function Code used to route dispute files from an issuer to the ER&R Contractor.

7.3 CMS EFT Inbound Folder/Directory

Issuers must submit the SBE Payment Dispute Form to the same inbound folder/directory that issuers use for the HIX-820 file transfer process.

7.4 File Receipt Acknowledgement

The ER&R Contractor acknowledges receipt of a dispute file by sending an acknowledgement email. The issuer's point of contact (POC) listed within the dispute file is the recipient of the acknowledgement email. Issuers can also expect to receive an email from the ER&R Support Center in situations where the automated system rejects a dispute file. The rejection email provides an explanation for the dispute file rejection and guidance to correct the issue(s).

When dispute files are missing POC information or contain invalid POC information, the ER&R Support Center will attempt to contact the issuer using an alternate method. Issuers who have not received an email confirmation within 24 business hours should contact the [ER&R Support Center](#) to verify that the ER&R Contractor received the file.

NOTE: Server outages may prevent and/or delay the delivery of an email confirmation or PPR-820 Dispute Response file.

7.5 Processing Timeline

The ER&R Contractor processes Payment Dispute files during business days, Monday through Friday. Files received before 3:00pm ET Monday through Friday will be processed by the ER&R Contractor that same day. Issuers can expect next-day processing for files received after 3:00pm ET. Payment Dispute files submitted over the weekend are time-stamped with the date and time of receipt and processed by the ER&R Contractor the following Monday.

The ER&R Contractor will process Payment Dispute files submitted on a holiday (that falls on a normal weekday) on the day of receipt, as the ER&R Contractor processing schedule does not observe holidays.

NOTE: The ER&R Support team may suspend dispute processing for up to 72 hours after the receipt of the PPR/HIX-820 each month. This suspension allows the automated system to update and ensures that disputes received after the PPR/HIX-820 generation date are processed correctly.

The ER&R Contractor processes dispute files through an automated system that resolves a significant majority of disputes. Automated processing is complete within approximately one business day of receipt of the dispute file. Disputes not resolved through automation undergo manual processing.

The [PPR-820 Dispute Response File](#) provides the outcome of the disputes within one business day after automated processing. Disputes requiring manual processing are categorized initially as “In Process/In Analysis”. When dispute analysis is complete, the updated dispute data is included in the [SBE Semi-Monthly Issuer Report](#).

8.0 Understanding a Processed SBE Payment Dispute

CMS assigns one disposition code and up to five detail codes to each dispute record during dispute processing. Issuers receive dispute outcomes in two ways: the PPR-820 Dispute Response file and the Semi-Monthly Issuer Report.

8.1 Disposition and Detail Codes

A disposition code describes the current condition of the Payment Dispute. This code indicates the timeframe that issuers can expect to see a change in status or if issuers need to take further action to analyze and resolve the discrepancy.

Table 12 delineates the disposition codes that are defined for an SBE Payment Dispute.

Table 12: SBE Payment Dispute Disposition Codes

Disposition Code	Category	Disposition Code Description
SR1	Rejected/Returned	Record/File Does Not Meet Format Requirements
SR2	Rejected/Returned	Record Does Not Meet Dispute Requirements
SR3	Rejected/Returned	PPR/820 Dispute Form Flds Do Not Match PPR/820
SR4	Rejected/Returned	Duplicate Dispute Record
SR8	Rejected/Returned	Multiple Conflicting Disputes for Same Policy

Disposition Code	Category	Disposition Code Description
SC2	Completed/Closed	Timing Issue Update planned for Next Cycle
SC5	Completed/Closed	Already Corrected by Payments/Adjustments
SI2	Status: In Process/In Analysis	In Process
SI4	Status: In Process/In Analysis	In Process
SF1	Status: Forwarded to SBE	Discrepancy to be Resolved by SBE and Issuer

Detail codes provide an additional level of detail that explains why the specific disposition code was applied to the dispute and any applicable next steps.

Refer to Appendix B: Disposition and Detail Code List for the SBE Payment Disposition and Detail Code List.

Issuers can also download the Disposition and Detail list from zONE at the following link:

<https://zone.cms.gov/document/sbm-disputes-disposition-and-detail-code-list>

8.2 PPR-820 Dispute Response File

Issuers receive the PPR-820 Dispute Response File in a PSV format. The PPR-820 Dispute Response File layout is the same as the Dispute Form submitted by the issuer with additional data columns, as detailed in Table 13. The following fields are appended to the Detail Record (fields F1-F23).

Table 13: PPR-820 Dispute Response File Additional Data Columns

Field Description	Format	Example	Field Length	Comments
CMS Dispute Control Number A unique case number. Do not populate – ER&R Contractor use only.	Alphanumeric – The letter "S" followed by 1 to 9 digits	S999999	1-10	This is a required field.
Disposition Display Value A code representing the newest status of the dispute	Alphanumeric	SR1	1-50	This is a required field.
Feedback to Issuer Comments or feedback from ER&R	Alphanumeric	Rejected, syntax errors, see response	1-1000	This is not a required field.

Field Description	Format	Example	Field Length	Comments
Detail Code 1 The first dispute detail code	Alphanumeric	F5SR1	1-10	This is a situational field. If applicable, this field includes the value detailing the field in which the error was encountered (e.g. F5=Field 5=Payment Cycle Month), and the specific rules that caused the error to fail (e.g. SR1=Situational Rule 1=Field did not meet expected format.).
Detail Code 2 The second dispute detail code	Alphanumeric	F5SR1	1-10	This is a situational field. See Comments for Detail Code 1.
Detail Code 3 The third dispute detail code	Alphanumeric	F5SR1	1-10	This is a situational field. See Comments for Detail Code 1.
Detail Code 4 The fourth dispute detail code	Alphanumeric	F5SR1	1-10	This is a situational field. See Comments for Detail Code 1.
Detail Code 5 The fifth dispute detail code	Alphanumeric	F5SR1	1-10	This is a situational field. See Comments for Detail Code 1.

Refer to Appendix D for an example of the PPR-820 Dispute Response File.

Each SBE receives a monthly report listing all the Payment Dispute response records (excluding disputes rejected during CMS' automated processing) sent to CMS that month. The report is an aggregated collection of the response files and provides disputes with their assigned disposition codes.

Refer to Appendix F for an example of the SBE Dispute Disposition Report.

8.2.1 Receiving the PPR-820 Dispute Response File

The ER&R Contractor sends the PPR-820 Dispute Response File within one business day after processing the disputes. Issuers retrieve the PPR-820 Dispute Response File from CMS EFT the same folder/directory that issuers use when submitting the SBE issuer Dispute file.

Table 14 delineates the PPR-820 Dispute Response File naming convention used to transmit the files to the issuers.

Table 14: PPR-820 Dispute Response File – File Naming Convention

File Naming Convention	Definition
File Name Structure Example	TPID.ERRSBM.Dyymmdd.Thhmmssmmm.P.OUT
TPID	Issuer's Trading Partner ID (TPID), also known as the Source ID

File Naming Convention	Definition
ERRSBM	ER&R Contractor Function Code for SBE disputes
Dyymmdd	Date Stamp, D is static text where yy is year, mm is month, dd is day
Thhmmssmmm	Time Stamp, T is static text where hh is hours, mm is minutes, ss is seconds, and mmm is milliseconds
P	Production Environment
OUT	Direction of data flow (Outbound to issuer), defaulted to “OUT”

8.3 Timing of Disposition Reporting to Issuers and SBEs

As described in 8.2, issuers will receive Dispute Response Files within one business day of dispute submission. All SBEs will receive dispute records for their issuers on the DDR+ reports on a monthly basis. Because of this difference in timing, it is possible that issuers and SBEs will receive a different disposition and detail code for individual disputes depending on the timing of the dispute submission.

The payment dispute process references the enrollment data on the most recent EPS Extract file. When an issuer submits a dispute file, they can expect the dispositions and details codes found on their Dispute Response File to reflect the data found on the last EPS Extract transmitted by CMS. Before CMS transmits the DDR+ reports to the SBEs, CMS re-processes all disputes using a more recent EPS Extract file. If the enrollment data for a disputed policy has changed, this may result in a new disposition and/or detail codes for any particular dispute.

SBEs receive the most up-to-date disposition and detail codes on their DDR+ reports. If any disputes were assigned different disposition and/or detail codes due to re-processing, these re-dispositioned disputes are communicated to the issuers on the Semi-Monthly Issuer Report.

Some issuers may wish to avoid reprocessing of disputes and receiving a Semi-Monthly Issuer Report. In order to do so, issuers should submit disputes during a dispute submission window that occurs after each month’s EPS Extract transmission and before the final business day of the month.

Disputes submitted in this Dispute Submission Window are processed with the most recent SBE submitted data and before DDR+ reports are generated for distribution to the SBEs. This results in response files that are in sync with the information provided to the SBEs on their monthly reports.

See Appendix H for detailed examples that illustrate how the disposition codes could be assigned based on different timing scenarios.

8.4 Understanding Persistent Disputes

Persistent disputes are enrollment discrepancies that are identified through the disputes process that have been previously identified by an earlier month’s disputes. Persistent disputes may indicate a policy or group of policies that are not being resolved through normal issuer and SBE reconciliation processes. CMS tracks these persistent enrollment discrepancies and attempts to provide support and technical assistance if requested by the issuer or SBE.

Due to the nature of SBE policy-based payment dispute processing system, CMS does not have visibility into the SBE enrollment reconciliation processes that may lead to a payment dispute’s resolution. For any given dispute, any one of the following could occur after the dispute’s submission:

- ▶ Both agree and SBE original data accepted by the issuer (SBE correct)
- ▶ Both agree and SBE changes their data to match the issuer (issuer correct)
- ▶ Both agree that a third value is correct (both incorrect)

- ▶ No resolution reached (no agreement)

Due to this lack of visibility, CMS plans to track persistent disputes in two main ways:

- ▶ Re-submitted disputes
- ▶ Inferred by previous disputes

8.4.1 Re-submitted Persistent Disputes

The most accurate way for CMS to know that an enrollment discrepancy continues to exist is for the issuer to re-submit the exact same dispute that was previously submitted. For example, in February, an issuer disputes an APTC payment for the January payment cycle. In March, the issuer notices that they continue to disagree with the January APTC payment and it has not been adjusted in the most recent payment cycle. That issuer can re-submit the exact same dispute that disputes the January APTC payment in March.

If possible, issuers should plan to set up a process where disputes are re-submitted each month if the disagreement continues to exist to allow CMS to easily identify and track the disagreement.

This method allows CMS to track all persistent disputes, including:

- ▶ Start and end date disputes
- ▶ Terminated policies
- ▶ Disagreements that continue into the following coverage year

This allows CMS to identify that this dispute is persisting over time and to track it. CMS expects to see the same dispute re-submitted each month until the disagreement is resolved.

8.4.2 Inferred Persistent Disputes

For issuers who are unable to re-submit disputes for outstanding enrollment discrepancies, CMS identifies persistent discrepancies by inference through issuers' routinely submitted disputes.

For example:

1. After receiving the January PPR, an issuer disputes a missing January APTC payment for policy 7777777.
2. After receiving the February PPR, the issuer disputes a missing February APTC payment for policy 7777777.
3. CMS can infer that the missing January payment is still in disagreement based on the February dispute and will track the disagreement.

8.5 SBE Semi-Monthly Issuer Report

The SBE Semi-Monthly Issuer Report is generated for a particular issuer when the disposition status has changed for any Payment Disputes since the last SBE Semi-Monthly Issuer Report was run. Disposition statuses for disputes can change due to two different reasons:

1. The original assigned disposition was In-Process. This disposition indicates that CMS is currently performing maintenance that may affect the disputed policy. Once CMS has completed the related maintenance, they will assign a new disposition to the dispute.
2. Before CMS transmits dispute records to SBEs on the monthly DDR+ reports, all disputes are re-processed using the most recent EPS Extract data. Therefore, if the most recent EPS Extract includes updated data for any disputed policies, it may lead to a new disposition for disputes.

For example, a dispute may have originally indicated a disagreement between the issuer's enrollment data and the SBE's enrollment data and been assigned an SF1 disposition. Then, a new EPS Extract is

generated later in the month which shows that the SBE has submitted new data for the disputed policy that agrees with the issuer's enrollment data. The policy will be re-dispositioned to reflect a Timing Issue. The new disposition will be communicated to issuers on the Semi-Monthly Issuer Report.

The Semi-Monthly Issuer Report includes the Issuer Assigned Dispute Control Number and the CMS Dispute Control Number for each dispute. Issuers may use this data to trace disputes by associating the Semi-Monthly Issuer Report data with the original dispute file(s). The report is produced in two formats – an Excel version and a PSV version.

- ▶ The Excel version includes all the details of the PPR-820 Dispute Response File, in the SBE Payment Disputes tab, with an additional field, the Disposition Date. Each row of this tab provides the original fields from the issuer's dispute submission detail record and all the fields from the Response File. Refer to Appendix E for an example of the Excel version of the SBE Semi-Monthly Issuer Report.
- ▶ The PSV version of the Semi-Monthly Issuer Report is identical the PPR-820 Dispute Response File. Refer to Appendix D for an example of the PPR-820 Dispute Response File.

8.5.1 Receiving the SBE Semi-Monthly Issuer Report

The ER&R Contractor distributes the SBE Semi-Monthly Issuer Report on the 1st and 16th (or the first business day thereafter) via CMS EFT. Issuers will receive the report in both Excel and PSV formats.

Table 15 details the CMS EFT function code necessary for routing the report in each format type.

Table 15: SBE Semi-Monthly Issuer Report – CMS EFT Function Codes

Report Format	Function Code	Description
SBE Semi Monthly Issuer Report: Excel Format	ERRSBD	▶ Contains disputes based on the payment file (PPR/HIX-820) file format that had a change in the Disposition Code since the last Semi-Monthly Issuer Report. ▶ The Disposition Date field supplies the date and time on which the dispute's Disposition Code changed. Issuers identify the new Disposition Code in the preceding, adjacent field.
SBE Semi Monthly Issuer Report: .PSV Format	ERRSBZ	▶ This file is formatted just like the Payment Response file so that it may be easily assimilated into issuer systems for processing.

Table 16 details the SBE Semi-Monthly Issuer Report file naming convention.

Table 16: SBE Semi-Monthly Issuer Report – File Naming Convention

File Naming Convention	Definition
File Name Structure: Excel File Name Structure: PSV	TPID.ERRSBD.Dyymmdd.Thhmmssmmm.P.OUT TPID.ERRSBZ.Dyymmdd.Thhmmssmmm.P.OUT
TPID	Issuer's Trading Partner ID (TPID), also known as the Source ID
ERRSBD	ER&R Contractor Function Code for SBE Semi Monthly Issuer Report: Excel Format
ERRSBZ	ER&R Contractor Function Code for SBE Semi Monthly Issuer Report: .PSV Format
Dyymmdd	Date stamp, where D is static text, yy is year, mm is month, and dd is day

File Naming Convention	Definition
Thhmmssmmm	Time stamp, where T is static text, hh is hours, mm is minutes, ss is seconds, and mmm is milliseconds
P	Production Environment
OUT	Direction of data flow (Outbound to issuer), defaulted to “OUT”

9.0 SBE Support and Resources

9.1 ER&R Support Center

The ER&R Support Center is available to provide assistance with issues or questions related to the SBE Payment Dispute documents, systems or processes.

Contact the ER&R Support Center by telephone at (855) 591-7113 or email at SBEEERRSupportCenter@cognosante.com.

The ER&R Support Center is available:

- ▶ Monday through Friday (Federal holidays observed)
- ▶ 8:00 am – 8:00 pm (ET)

NOTE: Issuers should identify themselves as an SBE issuer when contacting the ER&R Support Center.

9.2 Additional Resources

- ▶ SBE Payment Dispute Issuer information:
<https://zone.cms.gov/wiki/sbm-issuer-information>
- ▶ SBE Payment Dispute Workbook:
<https://zone.cms.gov/document/issuer-dispute-form>
- ▶ SBE Payment Dispute Disposition and Detail Code List:
<https://zone.cms.gov/document/sbm-disputes-disposition-and-detail-code-list>
- ▶ SBE Payment Disputes 101 Training:
<https://zone.cms.gov/document/cms-sbe-payment-disputes-101-training>
- ▶ SBE Payment Disputes 201 Training:
<https://zone.cms.gov/document/cms-sbe-payment-disputes-201-training>

Appendix A. SBE Payment Dispute Form

Access the SBE Issuer Payment Dispute Form by double-clicking the icon.



SBMIssuerPayment
DisputeForm v1 201

Appendix B. Disposition and Detail Code List

Access the SBE Dispute Disposition and Detail Code List by double-clicking the icon.



SBE Payment
Dispute Disposition

Appendix C. SBE Payment Dispute – Complete File Examples

Access a reproduction of the Excel Example File worksheet in the SBE Payment Dispute Form, which lists five sample disputes, by double-clicking the icon.



**Excel Example
File.xlsx**

The following chart shows the data found in the five Excel sample disputes in the corresponding PSV format:

Header record (Excel rows 1-9)	C12345678 JohnSmith 8001111234EXT849204 john smith@company.com 20170201 162055 000004930 A000009
Detail record 1 (Excel row 12)	12345 ABC123456789 0001503934 56291448 20170 2 492616725 693816725 20170201 20170210 2017 0228 20170227 4022.35 2534.50 513.48 234.06 174.59 90.48
Detail record 2 (Excel row 13)	12345 0001503935 56291448 201702 20170201 20170201 20170228 20170228 1200.00 1200.00 513.48 234.06 CA213555000
Detail record 3 (Excel row 14)	12345 0001503935 14485629 201702 20170201 20170201 20170228 20170228 1050.00 1050.00 523.48 244.06
Detail record 4 (Excel row 15)	12345 0001503936 29144856 201702 20170201 20170228 900.00 475.00 90.00
Detail record 1 (Excel row 12)	12345 ABC123456789 0001503934 56291448 20170 2 492616725 693816725 20170201 20170201 2017 0228 20170228 4022.35 2534.50 513.48 234.06 174.59 90.48 2017-SBE- 00007 S999999999 2017-SBE-00001

Appendix D. SBE Payment Dispute Response File Example

The following is an example of the SBE Payment Dispute Response file and illustrates where the CMS Dispute Control Number, disposition code, and detail codes appear.

CMS Dispute Control Number	Disposition Code	Detail Code
50.00 100.00 75.00 S111111111	SR1-Record/File Does Not Meet Format Requirements	SF1SR3 SF15SR1
50.00 100.00 75.00 S222222222	SR2-Record Does Not Meet Dispute Requirements	SF8SR4 SF10SR4
50.00 100.00 75.00 S333333333	SC2-Timing Issue - Update planned for next cycle	SPD1599
50.00 100.00 75.00 S444444444	SF1-Discrepancy to be Resolved by SBE and Issuer	SPD501

CMS Dispute Control Number	Disposition Code	Detail Code(s)	Detail Code Meaning
S111111111	SR1-Record/File Does Not Meet Format Requirements	SF1SR3 SF15SR1	Field 1, Issuer (HIOS) ID, Required field is missing Field 15, APTC Amount (Issuer), Field did not meet expected format
S222222222	SR2-Record Does Not Meet Dispute Requirements	SF8SR4 SF10SR4	Field 8, Coverage Period Start Date (PPR/HIX820), Situational criteria not met. Field 10, Coverage Period End Date (PPR/HIX820), Situational criteria not met.
S333333333	SC2-Timing Issue – Update planned for next cycle	SPD1599	The disputed Coverage Date(s) and/or Amount(s) match the most recent EPS Extract file and resolve this dispute.
S444444444	SF1-Discrepancy to be Resolved by SBE and Issuer	SPD501	The APTC Amount (Issuer) reported in the Payment Dispute did not match the most recent EPS Extract file. CMS recommends further issuer and SBE communication to resolve this discrepancy.

Appendix E. Semi-Monthly Issuer Report Example

The following is an example of the Semi-Monthly Issuer Report.

A	B	C	D	E
Issuer (HIOS) ID	Issuer Assigned Dispute Control Number	Exchange Assigned Subscriber ID	Exchange Assigned Policy ID	Payment Cycle Month
12345	A001001JAN583	XXXXXXXXXX	XXXXXXXXXX	201801
12345	A001001JAN815	XXXXXXXXXX	XXXXXXXXXX	201801
12345	A001001JAN1189	XXXXXXXXXX	XXXXXXXXXX	201801
12345	A001001JAN1378	XXXXXXXXXX	XXXXXXXXXX	201801
12345	A001001JAN1433	XXXXXXXXXX	XXXXXXXXXX	201801
12345	A001001JAN1712	XXXXXXXXXX	XXXXXXXXXX	201801
12345	A001001JAN1894	XXXXXXXXXX	XXXXXXXXXX	201801
12345	A001001JAN1938	XXXXXXXXXX	XXXXXXXXXX	201801
12345	A001001JAN2202	XXXXXXXXXX	XXXXXXXXXX	201801
12345	A001001JAN2529	XXXXXXXXXX	XXXXXXXXXX	201801

SBE Payment Disputes
+
1

Appendix F. SBE Dispute Disposition Report Specifications

Access the SBE Dispute Disposition Report (DDR+) Specification by double-clicking the icon below.



SBE Payment
Dispute Disposition

Appendix G. SBE File Exchange Diagram

Printable version of the SBE File Exchange between CMS, Issuers and SBEs



SBE File Exchange
Diagram.docx

Appendix H. Dispute Submission Timing Scenarios

Detailed examples of different disposition codes based on different timing scenarios



Timing Scenarios