

State Based Exchange (SBE) Enrollment Reporting Office Hours and Issuer Meeting



*Center for Consumer
Information and Insurance
Oversight (CCIIO)*

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Agenda

- General Updates
- Early Year Payment Adjustments
- Updated Interface Control Documents (ICDs)
- Future ICD Updates
- Updated PBP Transition Guide and FAQ
- Disputes Update
- Production Simulation Updates
- SBE Performance Data Metrics Report
- Production Payment Cycle Files Update
- Reference Documents
- Q&A

General Updates

General Updates

- CMS will schedule both the SBE and issuer meetings on a quarterly basis instead of monthly.
- Please send SBE contact updates via email to FMCC fmcc@cms.hhs.gov.
- If you have any ingestion or data issues, please email the FEPS Help Desk at CMS_FEPS@cms.hhs.gov as soon as possible.

Early Year Payment Adjustments

Early Year Payment Adjustments

SBE	Participating	Format	Months for Adjustments
CA	No		
CO	Yes	Initials	January, February
CT	Yes	Initials	January, February
DC	No		
ID	No		
MA	Yes	Initials	January, February
MD	No		
MN	Yes	Workbooks	By default, MN issuers will be paid using manual workbooks until CMS and the SBE reach an agreement to end adjustments
NV	Yes	Workbooks	By default, NV issuers will be paid using manual workbooks until CMS and the SBE reach an agreement to end adjustments
NY	Yes	Initials	January, February, March
RI	No		
VT	Yes	Workbooks	Varies by issuer as requested by VT based on consultation with its issuers
WA	Yes	Initials	January, February

Updated Interface Control Document

Updated Interface Control Documents (ICD)

- CMS updated the ICD for both SBEs and SBE Issuers. These may be found on CMS zONE:
 - SBE ICD: <https://zone.cms.gov/document/state-internal-control-document-icd>
 - SBE Issuer ICD: <https://zone.cms.gov/document/issuer-sbe-icd>

ICD Updates Include

- Minor corrections to address typos, clarify terminology and reflect current processing
- Changed the name of the "EPS Extract" within each document to "EPS SBE Extract"
- Updated the EPS SBE Extract file name to differentiate each file by coverage year
- Updated SBMI and EPS SBE Extract schemas to allow for new states that may become SBEs
- Enhanced EPS to process all files from SBEs regardless of order received – **SBE ICD Only**
- Corrected Appendix C - Record of Changes which previously reflected the SBE ICD Appendix C – **Issuer ICD Only**

EPS SBE Extract Function Code Reminder

- CMS will implement the updated EPS SBE Extract Function Code beginning with the January payment cycle:
 - PROD-R: December 11th (MN and NV only)
 - Production: December 20th (All SBEs except MN and NV)
- Change to the function code:
 - Current: **EPSEXT**
 - Current function code for any extract of any coverage year
 - Current file name: **FEP0100MO.EPSEXT.D191022.T140619447.P**
 - New: **SBEX99** (where 99 = last two digits of Plan Year)
 - Function code of EPS extract for plan year 2018
 - New file name: **FEP0100MO.SBEX18.D191022.T140619447.P**
- As of the October 2019 payment cycle, all EPS SBE Extracts for all coverage years will be transmitted each payment cycle regardless if the SBE submitted a new SBMI file for that payment cycle.

Future ICD Updates

Non-Transitioned SBE Issuer Changes

If you have ever been paid via PBP in the past this will not affect you in any way.

To support CMS data integrity, beginning in March 2020 CMS will reject policies by coverage year for SBE Issuers that are not transitioned. Non-Transitioned issuers are those issuers that did not sign an IEA before a transition to SBE PBP and/or did not set up a Payee ID.

Non-Transitioned SBE Issuer Changes (cont'd)

Rejection codes and warnings based on how the SBE sends files to CMS:

- Issuer file or Issuer file sets:
 - Reject entire issuer file or issuer file set with error ER-076: Non-Transitioned Issuer files cannot be accepted
 - Only 1 ER-076 will be logged per issuer file or file set
 - ER-076 will be reported on the SBMS since it's a file rejection
- State-wide file:
 - Only policies belonging to non-transitioned issuers will be rejected with error ER-077: Policies are not accepted for non-transitioned issuers
 - In addition to the error, CMS will log a warning: WR-013 Policies belonging to non-transitioned issuers have been rejected
 - ER-077 will be logged for each policy but will not be reported on the SBMR.
 - Only one WR-013 will be logged and reported on the SBMR at the file level
- Non-transitioned issuer errors will be excluded from the Error Threshold validation
- Non-transitioned issuer policies will be excluded from the missing policy lists

Updated PBP Transition Guide and FAQ

Policy-Based Payment (PBP) Transition Guide

- CMS updated the PBP Transition Guide.
- Intended audience:
 - SBEs that transition from manual workbooks to PBP
 - SBEs that transition from the FFE or SBE-FP
- Updates include:
 - Guidelines for States to transition from either an FFE or an SBE-FP to SBE
 - More streamlined language and process descriptions
 - A step-by-step process for the transition
- The updated PBP Transition Guide can be found on zONE:
<https://zone.cms.gov/document/sbe-faqs-bbp-transition>

PBP Transition Frequently Asked Question (FAQ) Document

- CMS updated the PBP Transition FAQ document
- Updates include:
 - Questions from the most recent Issuer and SBE meetings
 - Corrections to reflect current CMS processes
 - Added a Table of Contents (TOC) and organized questions by topic
- The updated PBP FAQs can be found on zONE:
<https://zone.cms.gov/document/sbe-faqs-pbp-transition>

NEW PBP Transition FAQs

- **Q14:** *How do the issuers know if an SBE doesn't submit an SBMI?*
- **A14:** The presence of a "Y" in the <ActivityInd> field located in the RecentErrorReporting portion of the SBE EPS Extract confirms that an SBMI has been submitted since the most recent EPS extract. An "N" means no new activity or errors since the last EPS SBE Extract, either because the SBE did not submit an SBMI or because the SBMI submission showed no changes or errors. Issuers that are uncertain about their SBE's most recent SBMI submission should communicate with their SBE to confirm that the SBE submitted an SBMI to CMS.

NEW PBP Transition FAQs

- **Q15:** *Is it possible to continue to receive a prior year EPS SBE Extract?*
- **A15:** Yes, CMS will send (as of October 2019 payment cycle) the EPS Extract to all issuers each month for the current and all prior plan years regardless of whether an SBMI was submitted to CMS for a prior plan year. We will work with SBEs and SBE issuers to determine a cutoff point for a prior plan year EPS SBE Extract deliveries.

NEW PBP Transition FAQs (Continued)

- **Q26:** *Is there a reference ID in disputes responses that could indicate if it was a recurring dispute?*
- **A26:** No, the Issuer Dispute Response file does not have a field that identifies if a dispute is recurring. The DDR+ report that is delivered to the SBEs shows all the disputes received within the month. The DDR+ report has three additional column fields that outlines if the dispute is persistent, type of persistence (inferred or re-submitted), and the date of the original dispute that was submitted to CMS.

NEW PBP Transition FAQs (Continued)

- **Q27:** *What do we put for premium amount if the premium is off by \$.01 but we are disputing the APTC amount? Do we leave it blank?*
- **A27:** We recommend leaving the premium amount blank in this scenario since a difference between SBE and issuer amounts of two cents or less, which could result from rounding, is not considered a discrepancy. If the APTC value is the only discrepant amount with a difference of more than two cents, then the other financial fields (Premium and CSR) are not required. If the APTC dispute also contains an issuer premium amount value that is less than two cents different from the payment amount, we ignore the Total Premium portion and process the dispute for the APTC amounts.

Disputes Updates

New CSR Rejections

- CMS collects data on and calculates CSR amounts for verification purposes. PPRs report the policy-level advance CSR payments calculated by the PBP system, along with a program-level manual adjustment that reverses those payments.*
- CMS stops calculating and reporting these advance CSR adjustments at the end of each program year.
- Therefore, PPRs will only show calculated CSR adjustments for the current plan year; CSR adjustments are not shown as a line item on the PPR for prior years.
- Beginning in early 2020, the ER&R contractor will begin to reject all prior-year SBE CSR disputes which will mimic the rejected FFE CSR disputes. Details will be provided as soon as possible.
- Should an issuer choose to dispute calculated advance CSR amounts, any dispute file received as of January 1st of each calendar year should reflect only current year CSR amounts.

* CMS stopped making CSR payments in October 2017 due to lack of a valid appropriation. See Memo from Eric Hargan, Acting HHS Secretary, to Seema Verma, CMS Administrator, dated Oct.11, 2017 <https://www.hhs.gov/sites/default/files/csr-payment-memo.pdf>.

Production Simulation Updates

Production Simulation Updates

- To test recently updated production code, CMS will complete an annual Production Simulation run in the Prod-R region in December before the start of the actual production payment cycle.
- CMS will use any SBMIs sent to Prod before December 6, 2019 for Production Simulation testing in Prod-R. CMS will send an SBMR with a .R file to the SBE as a result of the Production Simulation run.
- No action is required from SBEs (except MN and NV) receiving these .R SBMR files. All previously-transitioned SBEs will also receive their usual SBMR files in production with a .P extension in their file name.

Production Simulation MN and NV

- The Production Simulation run will include MN and NV. MN and NV should not ignore the .R files.
- The SBMR files received from Production Simulation will provide important feedback as to the quality of the SBMI submissions.
- The Production Simulation run will be accelerated so that CMS can test code for all ingest and payment jobs.
- In addition to SBMR files, MN and NV SBEs will receive the EPS SBE Extract and PPR files for enrollment and payment validation. These files contain policy-level data based on the SBMI submissions.
- MN and NV issuers will receive .P PPR and HIX-820 files which contain program-level data based on their manual workbook submissions that will reflect their actual January payments.
- Upon approval by the SBE, MN and NV issuers will also receive .R files including EPS Extract, PPR, and HIX 820 files which contain policy level data based on the SBE's SBMI submissions for testing and validation purposes. These .R files may begin in the January or a later payment cycle.

Production Readiness (PROD-R) Calendar: MN and NV

PROD-R Cycle Milestones January 2020 – February 2020

PROD-R Cycle Milestones	January Payment Cycle	February Payment Cycle
SBE Submission Window	12/1 – 12/5	1/1 – 1/8
Transmit EPS Extracts to SBEs for 2020*	12/11	1/14
1A Manual Workbook Submission	12/18 – 12/19	1/21 – 1/22
CMS and SBE Analysis of EPS and Manual workbook submissions	12/20 – 12/24	1/23 – 1/24
Transmit EPS Extract to Issuers	TBD pending SBE approval	TBD pending SBE approval
Transmit PPR to SBEs & Issuers	TBD pending SBE approval	TBD pending SBE approval
Transmit HIX 820 to Issuers	TBD pending SBE approval	TBD pending SBE approval
*If applicable		

SBE Performance Data Metrics Report

SBE Performance Data Metrics

- CMS developed an SBE Performance Data Metrics report to provide uniform feedback to the SBEs as it relates to SBMI quality, issuer disputes, and prior-year changes.
- CMS's goal is to improve accuracy of APTC payments by eliminating data errors that affect payment.
- Performance Data Metrics include:
 - Total Rejected Policies
 - Total Missing Policies
 - Total Issuer Persistent Disputes
 - Total Aged Policies in Initial Status
 - Total Policies with APTC Changes (Prior Year Files only)
 - Total Policies with Status Changes (Prior Year Files only)
- Since SBEs vary considerably in size CMS will use number of policies submitted on the SBMI as a denominator for most metrics.

SBE Performance Data Metrics

- Representation of SBE Performance Data Metrics Report



SBE

XX

Year

2019

SBE Performance Data

Overall Performance Evaluation



Reason

Composite rank 3 out of 11 for the current payment cycle.

		Payment Cycle											
SBE	Metric	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
XX	Total Submitted Policies	210,129	198,003	197,079	196,457	196,324	196,677	196,867	196,546	197,324	194,989	194,786	194,870
XX	Total SBEs Ranked	11	11	11	11	11	11	11	11	11	11	11	11
XX	Composite Percent	0.0060%	0.0035%	0.0026%	0.0044%	0.0014%	0.0016%	0.0017%	0.0016%	0.0023%	0.0025%	0.0022%	0.0030%
XX	Composite Rank	5	3	2	3	2	2	2	3	2	3	3	3
XX	Total SBEs Ranked	11	11	11	11	11	11	11	11	11	11	11	11
XX	Total Rejected Policies	0	0	0	4	4	2	2	4	6	6	6	2
XX	Percent of Total Rejected Policies	0.0000%	0.0000%	0.0000%	0.0024%	0.0023%	0.0034%	0.0033%	0.0033%	0.0043%	0.0043%	0.0042%	0.0031%
XX	Rank of Rejected Policies	1	1	1	3	3	4	4	4	5	5	5	4
XX	Total SBEs Ranked	11	11	11	11	11	11	11	11	11	11	11	11
XX	Total Missing Policies	15	6	6	5	2	0	4	0	0	0	0	2
XX	Percent of Total Missing Policies	0.0135%	0.0054%	0.0085%	0.0059%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%	0.0021%
XX	Rank of Missing Policies	10	7	7	7	2	1	6	1	1	1	1	4
XX	Total SBEs Ranked												
XX	Total Aged Policies												
XX	Total Aged Policies in Initial Status												
XX	Percent of Total Aged Policies in Initial Status												
XX	Rank of Total Aged Policies in Initial Status												
XX	Total SBEs Ranked												
XX	Total Persistent Disputes												
XX	Percent of Total Persistent Disputes												
XX	Rank of Persistent Disputes												

SBE Overall Performance Evaluation

- SBE's rank out of total SBEs (varies by metric) based on composite percentage
 - SBE's percentage ranked against all SBEs

CMS SBE Performance Data Metrics		Overall Performance Evaluation	Reason
SBE	XX		Composite rank 3 out of 11 for the current payment cycle.
Year	2019		

SBE Performance Rejected Policies

- Total Rejected Policies
 - Sum of all rejected policies submitted on the SBMI(s)
- Percent of Total Rejected Policies
 - Total Rejected Policies as a percent of Total Submitted Policies
 - $\text{Total Rejected Policies} / \text{Total Submitted Policies} * 100$
- Rank of Rejected Policies
 - SBE's rank out of total SBEs that submitted SBMIs for the given coverage year and cycle based on percent of total processed policies rejected.
 - SBE's percentage ranked against all SBEs (lower percentage = higher rank)

Metric	Jan	Feb	Mar
Total Submitted Policies	303,370	308,141	309,010
Total SBEs Ranked	11	11	11
Total Rejected Policies	250	320	423
Percent of Total Rejected Policies	0.0820%	0.1040%	0.1370%
Rank of Rejected Policies	5	5	4

SBE Performance Missing Policies

- Total Missing Policies
 - Sum of all policies submitted on the SBMI(s) in a previous cycle that are flagged as missing on the current cycle's SBMI(s)
- Percent of Total Missing Policies
 - Total Missing Policies as a percent of Total Submitted Policies
 - $\text{Total Missing Policies} / \text{Total Processed Policies} * 100$
- Rank of Missing Policies
 - SBE's rank out of total SBEs that submitted SBMIs for the given coverage year and cycle based on percent of total processed policies missing
 - SBE's percentage ranked against all SBEs (lower percentage = higher rank)

Metric	Jan	Feb	Mar
Total Submitted Policies	303,370	308,141	309,010
Total SBEs Ranked	11	11	11
Total Missing Policies	0	12	2
Percent of Total Missing Policies	0.0000%	0.0039%	0.0007%
Rank of Missing Policies	1	4	5

SBE Performance Aged Policies

- Total Aged Policies
 - Count of all policies Submitted on the SBMI(s) that are "aged" (aged = 60 days or more from the policy start date)
- Total Aged Policies in Initial Status
 - Sum of all policies submitted on the SBMI(s) that are "aged" (aged = 60 days or more from the policy start date) and still in initial status (sent with effectuation indicator = N and policy end date > policy start date indicating a period of coverage)
- Percent of Total Aged Policies in Initial Status
 - Percent of an SBE's total policies that are "aged" and still initial status
 - $\text{Total "Aged" Policies in Initial Status} / \text{Total Aged Policies} * 100$
- Rank of Total Aged Policies in Initial Status
 - SBE's rank out of total SBEs that submitted SBMIs for the given coverage year and cycle based on percent of total aged policies in initial status
 - SBE's percentage ranked against all SBEs (lower percentage = higher rank)

Metric	Apr	May	Jun
Total Submitted Policies	303,370	308,141	309,010
Total SBEs Ranked	7	7	7
Total Aged Policies	245090	263001	278455
Total Aged Policies in Initial Status	115	178	197
Percent of Total Aged Policies in Initial Status	0.0005%	0.0007%	0.0007%
Rank of Total Aged Policies in Initial Status	3	4	3

SBE Performance Persistent Disputes

- Total Persistent Disputes
 - Sum of all policies submitted on the SBMI(s) that have been disputed for 2 or more consecutive months as of the latest submission month
- Percent of Total Persistent Disputes
 - Total Policies with Persistent disputes as a percent of total policies submitted on the SBMI
 - $\text{Total Policies with Persistent Disputes} / \text{Total Submitted Policies} * 100$
- Rank of Persistent Disputes
 - SBE's rank out of total SBEs that submitted disputes for the given coverage year and cycle based on percent of total policies with persistent disputes
 - SBE's percentage ranked against all SBEs (lower percentage = higher rank)

Metric	Apr	May	Jun
Total Submitted Policies	303,370	308,141	309,010
Total SBEs Ranked	8	9	7
Total Persistent Disputes	11	9	12
Percent of Total Persistent Disputes	0.0036%	0.0029%	0.0039%
Rank of Persistent Disputes	5	6	4

SBE Performance Prior Year APTC Changes

- Total Policies with APTC Changes
 - Sum of all policies submitted on the SBMI(s) that applied a change in the APTC amount to the previous version of the policy.
- Percent of Total Policies with APTC Changes
 - Total Policies with APTC Changes as a percent of Total Policies submitted on the SBMI
 - $\text{Total Policies with APTC Change} / \text{Total Processed Policies} * 100$
- Rank of Total Policies with APTC Changes
 - SBE's rank out of total SBEs that submitted SBMIs for the given coverage year and cycle based on percent of total policies with APTC changes
 - SBE's percentage ranked against all SBEs (lower percentage = higher rank)

Metric	Jan'19	Feb'19	Mar'19
Total Submitted Policies	333,322	334,902	334,902
Total SBEs Ranked	10	10	10
Total Policies with APTC Changes	13	28	0
Percent of Total Policies with APTC Changes	0.0039%	0.0084%	0.0000%
Rank of Total Policies with APTC Changes	3	3	1

SBE Performance Prior Year Status Change

- Total Policies with Status Change
 - Sum of all policies submitted on the SBMI(s) that applied a change to the status of the previous version of the policy.
- Percent of Total Policies with Status Change
 - Total Policies with Status change as a percent of Total submitted Policies
 - $\text{Total Policies with a status change} / \text{Total Policies} * 100$
- Rank of Total Policies with Status Change
 - SBE's rank out of total SBEs that submitted SBMIs for the given coverage year and cycle based on percent of total policies with a status change
 - SBE's percentage ranked against all SBEs (lower percentage = higher rank)

Metric	Jan'19	Feb'19	Mar'19
Total Submitted Policies	333,322	334,902	334,902
Total SBEs Ranked	10	10	10
Total Policies with Status Change	10	22	0
Percent of Total Policies with Status Change	0.0032%	0.0066%	0.0000%
Rank of Total Policies with Status Change	4	5	1

SBE Performance Composite

- Composite Percent (based on average of individual metrics)
 - Average of all individual percentages calculated for the given coverage year and cycle (excluding persistent disputes)
 - Average of all percentages
- Composite Rank (based on average of individual metrics)
 - SBE's rank out of total SBEs (varies by metric) based on composite percentage
 - SBE's percentage ranked against all SBEs (lower percentage = higher rank)

Metric	Jan	Feb	Mar
Total Submitted Policies	210,129	198,003	197,079
Total SBEs Ranked	11	11	11
Composite Percent	0.0060%	0.0035%	0.0026%
Composite Rank	5	3	2

Production Payment Cycle Files

Production Payment Cycle Files Update

PROD Cycle Milestones December 2019 – February 2020

PROD Cycle Milestones	December Payment Cycle	January Payment Cycle	February Payment Cycle
SBE Submission Window	11/1 – 11/10	12/1 – 12/10	1/1 – 1/10
CMS Freeze Period	11/11 – 11/15	12/11 – 12/15	1/11 – 1/15
Transmit EPS Extracts to SBEs & Issuers for 2020	-		
Transmit EPS Extracts to SBEs & Issuers for 2019	11/21	12/19	1/21
Transmit EPS Extracts to SBEs & Issuers for 2018	11/22		
1A Manual Workbook Submission*	11/18 – 11/20	12/18 – 12/19	1/21 – 1/22
SBE Dispute Disposition Report (DDR+) transmitted	NLT 12/5	NLT 1/5	NLT 2/5
Transmit 820 PPR to SBEs & Issuers	NLT 12/15	NLT 1/15	NLT 2/15
Treasury Funds Transmittal	12/21	1/22	2/20
Transmit HIX 820 to Issuers	NLT 12/31	NLT 1/31	NLT 2/28

*If applicable

Key: Milestone Completed

Reference Documents

SBE Reference Documents

- SBE zONE page: <https://zone.cms.gov/community/exchange-community>
- Examples of documentation available:
 - ICD: (UPDATED) <https://zone.cms.gov/document/state-internal-control-document-icd>
 - SBE PBP Transition Guide: (UPDATED) <https://zone.cms.gov/document/sbe-issuer-transition-guide>
 - Payment Disputes Technical Reference Guide
<https://zone.cms.gov/document/sbe-payment-disputes-technical-reference-guide>
 - Enrollment and Payment Files Chart: https://zone.cms.gov/document/caltid-doc155988_sbm-policy-based-payment-pbp-files-chart
 - PBP Transition FAQ: (UPDATED) <https://zone.cms.gov/document/sbe-faqs-pbp-transition>
 - CSR Operations FAQ: <https://zone.cms.gov/document/csr-operations-faq>
 - Temporary Manual Adjustment Scenarios:
<https://zone.cms.gov/document/temporary-manual-adjustments-scenarios>

SBE Issuer Reference Documents

- SBE Issuer Information page: <https://zone.cms.gov/wiki/sbm-issuer-information>
- Examples of documentation available:
 - SBE Issuer Interface Control Document (ICD) (UPDATED)
 - SBE PBP Transition Guides (UPDATED)
 - SBE Issuer PBP FAQs (UPDATED)
 - SBE Payment Disputes Technical Reference Guide
 - Issuer Dispute Form
 - SBE Disputes Disposition and Detail Code List (UPDATED)
 - Previous Issuer Meeting Presentation Slides
 - CMS HIX820 Companion Guide

Q&A

