Issuer-FFM Data Alignment 101
Plan Year 2020

- *Standard Enrollment Files*
- *Key Identifiers*
- *Importance of Data Alignment*
- *Methods of Data Alignment*
- *Timing of Updates*

September 18, 2019

Standard FFM Enrollment Files

- Throughout enrollment operations, CMS and Issuers will exchange several standard files to convey data related to enrollments; these files include:

  - *I834s (*CMS to Issuer; Daily after 6PM ET*)*: Provides enrollment information to Issuers in standard X12 EDI 834 format

    - Used to convey initial enrollments, cancellations and terminations initiated on the FFM

    - Used to convey maintenance transactions (M834s) which update a policy previously sent to the Issuer

  - *IC834s (*Issuer to CMS; Processed throughout the day each day*)*: Allows Issuers to update the status of the enrollment by effectuating, cancelling, or terminating coverage at the policy level

    - Also used to reinstate policies previously cancelled or terminated by the Issuer

    - Used to update Issuer-Assigned IDs

Standard FFM Enrollment Files (cont.)

- *Pre-Audit Files (*CMS to Issuer; Monthly*)*: Reflects the current state of **all** enrollment records for an Issuer for a given plan year, regardless of status, as they reside on the FFM as of a specific date and time (typically 6PM Eastern on the 15th of the month)

- *RCNI Files (*Issuer to CMS; Monthly*)*: Allows Issuers to submit the state of their enrollments as the data resides on their system as of a specific date and time; compared to FFM Pre-Audit data to identify discrepancies between Issuer and FFM data

- *RCNO Files (*CMS to Issuer; Monthly*)*: Provides the results of the comparison between FFM and Issuer enrollment data, along with resolution flags for any discrepancies found based on established business rules

- **Note:** Other files are exchanged on a regular or ad hoc basis, such as Incremental Pre-Audit Files and Dispute Files; these files will be discussed in a future presentation

Key Data Elements

- It is critical that Issuers maintain and persist certain key data elements in their systems associated with enrollments received from the FFM; likewise, the FFM will persist identifiers supplied by the Issuer

- Key data elements include:

  - **Exchange-Assigned Member ID:** Constitutes a unique identifier for a specific individual when used in conjunction with the HIOS ID associated with the enrollment

  - **Exchange-Assigned Subscriber ID:** The Exchange-Assigned Member ID of the subscriber of the individual's enrollment group

  - **Exchange-Assigned Policy Number:** Unique identifier for the enrollment group's policy

  - **Issuer-Assigned Member ID:** Identifier for the individual as provided by the Issuer

  - **Issuer-Assigned Subscriber ID:** Identifier for the subscriber of the enrollment group as provided by the Issuer

  - **Issuer-Assigned Policy Number:** Identifier for the enrollment group's policy as provided by the Issuer

    - **Please Note:** This value should be unique to the enrollment group, and not a higher-level identifier such as a Group Number

Key Data Elements Throughout Enrollment Lifecycle
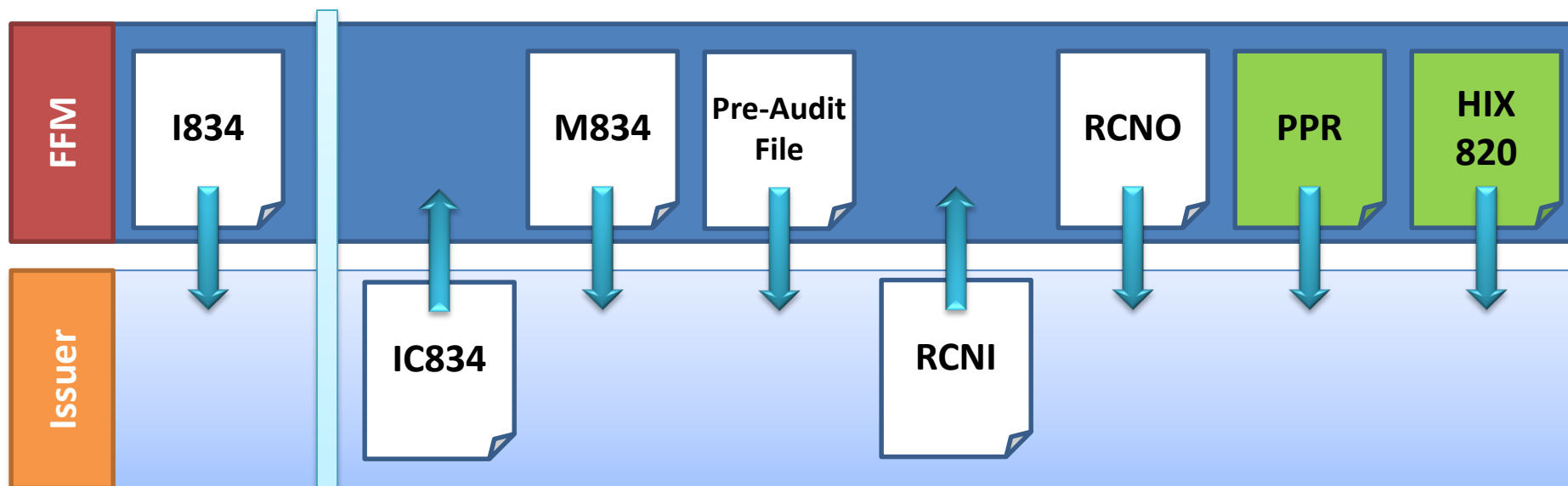
FFM: I834 · M834 · Pre-Audit File · RCNO · PPR · HIX 820

Issuer: IC834 · RCNI

- Exchange-Assigned Member ID
- Exchange-Assigned Subscriber ID
- Exchange-Assigned Policy Number

- Exchange-Assigned Member ID
- Exchange-Assigned Subscriber ID
- Exchange-Assigned Policy Number

- Issuer-Assigned Member ID
- Issuer-Assigned Subscriber ID
- Issuer-Assigned Policy Number

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Principal Concept: It is Critical to Synchronize Enrollment Data Between Issuer and the FFM

- To ensure a successful experience for Issuers and their enrollees, alignment of Issuer and FFM data is critical

- The FFM "owns" certain data elements, such as the Advanced Premium Tax Credit (APTC) Amount or fully-qualified QHP ID

- Likewise, Issuers "own" elements such as effectuation status

- It is vital that data from both sides is considered to fully understand the status and attributes of each enrollment record

- Timely alignment of enrollment data is necessary to support such activities as:
  - Policy-Based Payments
  - User Fee Calculations
  - Consumer Form 1095-A Generation
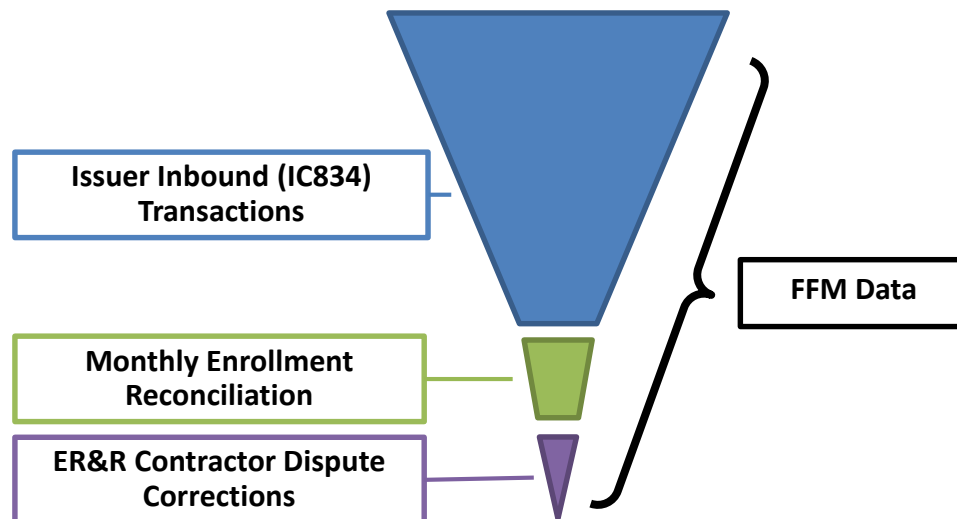 - Follow-On Actions by Enrollees on the FFM

Key takeaway: *Bad data causes inaccurate payments, incorrect information on Form 1095-As, and reenrollment issues*

Consistent, quality reconciliation matters!

Ensuring Data Consistency Between Issuers and the FFM

- Inbound 834 (IC834) transactions should be used to make basic updates to the status of an enrollment such as effectuation, cancellation, termination, or reinstatement

  – These transactions must pass stringent data quality checks and do not allow Issuers the flexibility to change certain data elements, such as the Benefit Start Date

Volume of Updates performed via each component of FFM Enrollment

Issuer Inbound (IC834) Transactions

Monthly Enrollment Reconciliation

ER&R Contractor Dispute Corrections

FFM Data

- Monthly Enrollment Reconciliation is an analytical process with greater flexibility in updating policies

  – Files must pass basic formatting checks and "sanity checks" on the updates to be made; approved updates are run against FFM via the Batch Update Utility (BUU)

- Dispute Corrections may involve manual inspection of a policy by the Enrollment Reconciliation & Resolution (ER&R) Contractor and direct contact with Issuer, and should represent the smallest contingent of enrollment updates applied to the FFM

Appropriate Updates for Each Method

- Below are a sampling of updates that are appropriate for each method of updating the FFM; a comprehensive list of data elements that can be updated by each method will be shared in a future session:
  - Inbound 834 Transactions
    - Policy Status (Effectuation, Cancellation, or Termination)
    - Reinstatements (where previously cancelled or terminated by the Issuer)
    - Issuer-Assigned Identifiers
  - Automated Enrollment Reconciliation
    - Updates that Failed IC834 Validation
    - Updates to Benefit Coverage Dates
    - Tobacco User Status
    - Agent/Broker Information
    - Mailing Address
  - ER&R Dispute Process
    - Complex Data Conditions Preventing Update via IC834 or Automated Recon
    - HICS Cases Not Aligned via Automated Recon

Timing of Updates for Each Method

- Inbound 834 Transactions
  - Any update that can be applied via IC834 transaction will result in the timeliest update to FFM data
    - Enrollment Data: Enrollment data updates are applied in near real-time on accepted IC834 transactions and once applied would be immediately reflected on the FFM
    - Payment Data: IC834 transactions accepted and applied by the monthly FFM extract (typically 6PM Eastern on the 15th of the month) will be reflected in the *following month's* policy-based payments

- Automated Enrollment Reconciliation
  - Updates required to FFM data are identified by the comparison of the monthly RCNI File submission to the FFM Pre-Audit extract
    - Enrollment Data: Approved enrollment data updates are applied to the FFM by a series of update files that are processed before the 15th of the following month; these updates will be present on the following month's Enrollment Pre-Audit File
    - Payment Data: As the updates will be applied by the 15th of the following month, the updates would propagate to policy-based payments in the month *after* they first appear on the Pre-Audit File (two months after submission on the RCNI File)

- ER&R Dispute Process
  - Each month, the ER&R team publishes a deadline by which Issuers can expect that accepted disputes will be processed before the 15th of the following month
    - Enrollment Data: Approved dispute updates submitted by the deadline are applied to the FFM before the 15th of the following month; these updates will be present on the following month's Enrollment Pre-Audit File
    - Payment Data: As the updates will be applied by the 15th of the following month, the updates would propagate to policy-based payments in the month *after* they first appear on the Pre-Audit File (two months after submission of the dispute)

Timing of Updates for Each Method

- Example: Effectuating a policy effective September 1st
  - RCNI File Submission Deadline: September 19th
  - ER&R Dispute Submission Deadline: September 23rd
  - Inbound 834 Transaction
    - Submitted and accepted before September 15th
      - Immediate update to FFM data
      - Update reflected in policy-based payments in October
  - Automated Enrollment Reconciliation
    - Submitted on the September RCNI File, approved and processed
      - FFM data updated by October 15th
      - Update reflected in policy-based payments in November
  - ER&R Dispute Process
    - Submitted by the September Dispute deadline, approved and processed
      - FFM data updated by October 15th
      - Update reflected in policy-based payments in November