

Enrollment Reconciliation & IC834 Workgroup



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EAPS Report Updates – Released for March Report Cycle

- **Applied to PY18 Versions ONLY:**
 - Addition of 1095-A corrections metric. This metric tracks the volume of issuer-initiated enrollment changes that trigger a corrected form 1095-A to be sent to a consumer.
 - For the March report, only a “Current Month” data set will be provided (no prior month comparison until April)
 - This metric is currently only reported for PY17 data
- **Applied to PY19 Versions ONLY:**
 - Addition of the following metrics:
 - Inbound 834 Reliance – Cancellations
 - Inbound 834 Update Acceptance Rate – Cancellations
 - Aged Initials
 - For the March report, only a “Current Month” data set will be provided (no prior month comparison until April)
- **March EAPS reports are scheduled to be published on March 21st**
- Please contact FMCC@cms.hhs.gov if you have any questions about the EAPS report.

IC834 – Housekeeping

- The PO-IC834 Reporting Suite including transactions received between 3/05 and 3/11 was delayed
- The IC834 team initiated a new process for low success communications to Issuers:
 - Acceptance rates below 80% by transaction type and plan year
 - Acceptance rates below 50% by transaction type and plan year
 - Notices will be sent bi-weekly from Inbound834@bah.com

IC834 – Processing Hold 3/20 – 3/25

- Final Marketplace Cloud migration is scheduled for the weekend of 3/23
- To support this, Inbound FFE Individual Market processing **will be on hold starting March 20, 2019 at 9:00 AM EST**
- During this period, Issuers can continue to submit IC834 transactions for all transaction types but functional and business acknowledgements (TA1, 999, and BAA) will not be delivered until processing resumes
- Submissions received will be queued up in anticipation of restart **on Monday, March 25 at 12:00PM EST**
- Transactions received during this hold will be processed after March 25, 2019 at 12:00PM EST and appear in PO-IC834 reporting suite on April 3
- Please contact Inbound834@bah.com if you have any questions

IC834 – Common Termination Errors

- Analysis of termination transactions received from Issuers for 2018 and 2019 policies over the last reporting period identified the following BAA error codes as key sources of rejection
- Issuers should be mindful of the following to ensure high success:
 - Review the weekly PO-IC834 reports and monthly Pre-Audit to determine the latest policy status to avoid out of sequence errors
 - Ensure the EligibilityEndDate on the IC834 is **after** EligibilityBeginDate of the policy and **before** the current EligibilityEndDate
 - Issuers are not permitted to extend policy end dates through Inbound 834
 - Verify that the QHPID value on the IC834 reflects what was sent on the Initial 834 (Initial 834) for the policy

PY 2019				PY 2018			
Rank	Error Code	Reason	% of Error	Rank	Error Code	Reason	% of Error
1	E095	Out of Sequence	49.1%	1	E093	QHPID	44.0%
2	E051	Eligibility End Date	44.0%	2	E051	Eligibility End Date	41.4%
3	E093	QHPID	2.9%	3	E095	Out of Sequence	11.0%

**All error calculations exclude E025, duplication*

IC834 – Transaction Order Sequence

- The following table includes information on the acceptable transaction order sequence through IC834

		Existing Policy Status in FFM				
		Initial	Effectuated	Terminated		Cancelled
				Initial	Effectuated	
IC834 Transaction Type request	Effectuation	Accepted	Rejected	Accepted	Rejected	Rejected
	Cancellation	Accepted	Accepted	Accepted	Accepted	Rejected
	Termination	Accepted	Accepted	Accepted*	Accepted*	Rejected
	Maintenance	Rejected	Accepted	Rejected	Accepted	Rejected
	Reinstatement	Rejected	Rejected	Accepted	Accepted	Accepted

* End date must be less than current end date

IC834 – Resources

- Educational material is available on CMS zOne to support Issuer performance ([zOne - IC834](#))
 - ASC X12 834 Companion Guide
 - Preparing IC834 X12 Files
 - Troubleshooting BAA Errors
 - Education on IC834 Reinstatement Transactions
 - OP834T Specifications Document

Housekeeping: Pre-Audit & Reconciliation

- **Prior Plan Years (2014-2018)**
 - The next set of 1095-A Consumer-Initiated Dispute Update (1095Ax) Files are scheduled for distribution on Wednesday, March 20th
- **Plan Year 2016**
 - This month's 2016 FFM extract will be taken tomorrow, Friday, March 15th at 6PM EDT
 - Incremental Pre-Audit (ISIPA6) Files based upon that extract are scheduled for delivery to Issuers on Thursday, March 21st
- **Plan Year 2017**
 - This month's 2017 FFM extract will be taken tomorrow, Friday, March 15th at 6PM EDT
 - Incremental Pre-Audit (ISIPA7) Files based upon that extract are scheduled for delivery to Issuers on Wednesday, March 20th

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2018**

- This month's 2018 FFM extract will be taken tomorrow, Friday, March 15th at 6PM EDT
- Comprehensive Enrollment Pre-Audit (AUD8) Files based upon that extract are scheduled for delivery to Issuers on Tuesday, March 19th
- **The RCNI8 submission deadline for the final scheduled Enrollment Reconciliation cycle (Run 16) is tomorrow, March 15th at 3PM EDT**
 - As of 11AM today, **55.1%** of 2018 FFM Issuers have successfully submitted for Run 16
 - Once your organization has applied any necessary terminations or other updates to 2018 data, please submit your file as soon as possible to ensure we have 100% Issuer participation in this final cycle
 - RCNO8 Files for Run 16 are scheduled for distribution to Issuers on Thursday, March 21st

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2019**
 - This month's 2019 FFM extract will be taken tomorrow, Friday, March 15th at 6PM EDT
 - Comprehensive Enrollment Pre-Audit (AUD9) Files based upon that extract are scheduled for delivery to Issuers on Tuesday, March 19th
 - The first set of Date of Birth Cleanup (MISC9) Files are also scheduled for distribution on Tuesday, March 19th
 - The RCNI9 submission deadline for March's Run 4 is Thursday, March 21st at 3PM EDT
 - RCNO9 Files for Run 4 are scheduled for distribution to Issuers on Tuesday, March 26th

Reminder: Changes to Pre-Audit, RCNI, and RCNO

- Recently, CMS published updated file specifications for the following files:
 - Enrollment Pre-Audit v5.0
 - Inbound Enrollment Reconciliation (RCNI) v5.0
 - Outbound Enrollment Reconciliation (RCNO) v5.0
- Although the changes reflected in the updated file specifications will not go into effect until later in 2019, it is important that Issuers closely review the changes now to prepare, plan, and implement the required changes in your processes
- CMS is also requesting Issuer feedback on the timeline to implement the changes to the RCNI file – please send any feedback to recon_issuer_support@bah.com with the subject line “RECON REASON CODES” by **tomorrow, Friday, March 15th**
- All three updated specs are available on zONE at:
<https://zone.cms.gov/document/enrollment-data-reconciliation>

Customer Support and ServiceNow Tickets Redundancies

- ER&R has recently received numerous ServiceNow tickets forwarded from the FEPS service desk that are duplicates of requests that had already been submitted directly to the ER&R Support Center.
- If an issuer submits a request to the ER&R Support Center, the issuer should not also send that request to the FEPS team, as that will create a duplicate ticket.

UIR Report Distribution

- ER&R will deliver the RCNO Run 15 UIR Reports for 2018 policies on Friday, March 15, using the **ERRUIR** function code.
- ER&R will deliver the RCNO Run 3 UIR Reports for 2019 policies on Friday, March 22, using the new **UIR9** function code.
- UIR Reports are only delivered to issuers with UIRs in that RCNO run.
- Issuers requested the new function code to eliminate confusion when RCNO is being processed for two (2) coverage years during the same month.
 - UIR Reports for coverage years prior to 2019 will continue to use the **ERRUIR** function code.
 - ER&R will continue to create a new function code for each future year.
 - For example, in 2020, the new function code will be **UIR0**.

Subscriber Swap Issue and UIR Impact

- As reported on previous Recon calls, CMS discovered unexpected system behavior where after a consumer updated their 2019 application, the original subscriber on the 2019 policy was inadvertently switched with a dependent on the policy.
- On 02/07/2019, CMS performed a data cleanup at the FFE to revert to the original subscribers of the impacted policies.
- On 03/07/2019, ER&R identified a large increase in the Subscriber Change UIR category for RCNO Run 3.
 - Because RCNO cannot match records without the issuer and FFM aligning on Subscriber Indicator, mismatches result in “I” records.
 - An analysis on the 02/07/2019 cleanup file identified over 3,000 impacted UIR records spread across multiple UIR categories.
 - In most scenarios, it appears issuers had not yet updated their systems to reflect the proper subscriber as sent on the MISC9 Files distributed on Thursday, February 21st
- **Resolution:** Issuers must reflect the proper subscriber for these enrollment groups in subsequent RCNI files to facilitate proper matching

zONE Publications

- FFE Payment Dispute Disposition and Detail Code List v21 is available on CMS zONE and includes new Payment Dispute detail codes.
- Issuers can review the updated documentation on CMS zONE:
 - <https://zone.cms.gov/document/enrollment-resolution-and-reconciliation>

Q&A

