

Enrollment Reconciliation & IC834 Workgroup



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IC834 – Housekeeping

- 4/10 PO-IC834 Reporting Suite
 - It was identified that the PO Detailed (OP834T) and Reinstatement Detailed (RI834T) file reflecting transactions between 4/2 and 4/8 did not reach Issuers last week
 - All files were queued up for delivery and successfully re-sent on Tuesday, 4/16
 - Please note that the OP834T filenames include date 'D190416'
- 4/17 PO-IC834 Reporting Suite
 - Files reflecting submissions received between 4/9 and 4/15 were delivered on schedule yesterday afternoon
 - Please note that the OP834T filename includes same date 'D190416'
- Issuers should not consider the files received yesterday as duplicates of the resubmitted 4/10 PO-IC834 Detailed report
- If you have any questions about specific IC834 transactions submitted or report delivery, please contact Inbound834@bah.com

IC834 – PY2018 Deadline

- Issuers are strongly encouraged to send all outstanding enrollment updates for Plan Year 2018 to the FFM
- The Inbound FFM Individual Market **will accept IC834 submissions for 2018 policies until Monday, August 12, 2019 at 11:59PM EST**
- Starting August 12, 2019, Issuers will receive negative BAA codes for “Year Out of Range” in response to IC834 transactions for 2018 policies
- Should an Issuer need to apply corrections for 2018 policies after August 12, 2019, trading partners may leverage the Enrollment Resolution and Reconciliation (ER&R) process
- Please note this deadline does not impact IC834 transactions for 2019 enrollments

IC834 – Maintenance – Processing Issue

- **Situation:** IC834 Maintenance transactions (001/25/ISSUER MAINT or 001/25/NO CHANGE) with a missing Eligibility Begin Date are not generating a BAA acknowledgement during processing
- **Reason:** EligibilityBeginDate is a required field based on X12 guidelines
- **How to find in PO Report:** Issuers can identify whether their IC834 maintenance submissions are missing this field in the OP834T
 - Trans_Type = 'MAINTENANCE'
 - Trans_Updt_Stus = '-'
 - Value in Eligibility Begin Date column is blank
- The team is working on updating the validation to ensure BAAs are generated for Issuers, and will follow up with details in the coming weeks
- If you have any questions about maintenance transactions submitted, please contact Inbound834@bah.com

Housekeeping: Pre-Audit & Reconciliation

- **Prior Plan Years (2014-2018)**
 - 1095-A Consumer-Initiated Dispute Update (1095Ax) Files were delivered to Issuers yesterday, Wednesday, April 17th
 - The next set of 1095-A Consumer-Initiated Dispute Update (1095Ax) Files is scheduled for distribution on Wednesday, May 1st
- **Plan Year 2015**
 - Comprehensive Enrollment Pre-Audit (AUD15) Files are scheduled for delivery to Issuers Monday, April 22nd

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2016**

- This month's 2016 FFM extract was taken on Monday, April 15th at 6PM EDT
- Incremental Pre-Audit (ISIPA6) Files based upon that extract are scheduled for delivery to Issuers tomorrow, Friday, April 19th
- Reminder: CMS had decided to create and distribute full 2016 Pre-Audit (AUD16) Files in May ahead of the off-cycle reconciliation process in June
 - An updated calendar reflecting this change is available on zONE at: <https://zone.cms.gov/document/pre-audit-and-recon-calendar-and-file-specification>

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2017**

- This month's 2017 FFM extract was taken on Monday, April 15th at 6PM EDT
- Comprehensive Enrollment Pre-Audit (AUD17) Files based upon that extract are scheduled for delivery to Issuers today, Thursday, April 18th

- **Plan Year 2018**

- This month's 2018 FFM extract was taken on Monday, April 15th at 6PM EDT
- Comprehensive Enrollment Pre-Audit (AUD8) Files based upon that extract were delivered to Issuers yesterday, Wednesday, April 17th
- **Please Note:** The final SADP Effectuation process for 2018 was run prior to the April extract; any new effectuations applied to the FFM are reflected on this month's AUD8 File

Housekeeping: Pre-Audit & Reconciliation

- **Plan Year 2019**
 - This month's 2019 FFM extract was taken on Monday, April 15th at 6PM EDT
 - Comprehensive Enrollment Pre-Audit (AUD9) Files based upon that extract were delivered to Issuers yesterday, Wednesday, April 17th
 - Date of Birth Cleanup (MISC9) Files were also distributed to impacted Issuers yesterday, Wednesday, April 17th
 - The deadline for Inbound Enrollment Reconciliation (RCNI9) File submission for April's Run 5 is **today, Thursday, April 18th at 3PM EST**
 - As of 11AM today, **95.8%** of 2019 FFM Issuers have successfully submitted for Run 5
 - **Please Note:** The first SADP Effectuation process for 2019 will be run prior to the May extract
 - SADP Issuers should use IC834 and Reconciliation to address any outstanding active/uneffectuated policies prior to this process

SADP Effectuation Process

- SADP enrollments more than 90 days old that are still being sent by the Issuer in initial status in reconciliation (Initial Premium Paid Indicator = N) and are in initial status on the FFM (Transaction Type Code = 1 and Confirmation Indicator = N as reflected on the Pre-Audit File) will be effectuated
 - To avoid potentially adverse impact to enrollees, any SADP enrollment with Applied APTC would be excluded from this process
- Effectuations of policies in initial status will result in charges for FFM User Fees in the following payment cycle, and invoices to Issuers if those charges cannot be netted from payments
- In order to avoid User Fee charges for policies that should not be effectuated, SADP issuers should ensure that cancellations are being sent to the FFM timely and accurately
- Cancellations and effectuations not yet applied to 2018 or 2019 policies can be submitted via IC834 transactions

EAPS Report Updates – Released for April Report Cycle

- **Applied to PY19 Versions ONLY:**
 - Addition of the following metrics:
 - Inbound 834 Reliance – Terminations, Reinstatements
 - Inbound 834 Update Acceptance Rate – Overall, Terminations, Reinstatements
 - Persistent I Flag Policy Count & Percent of Policies
 - Consists of 8 RCNO fields and summarized up to a single score on the Summary Score tab
 - For the April report, only a “Current Month” data set will be provided for the new metrics (no prior month comparison until May)
- **Applied to All Versions:** (Screenshot in following slide)
 - Publication of Historical Data
 - Detailed Metrics will now include all prior published metric data
 - Icon changed from yellow triangle to yellow exclamation point
- **April EAPS reports are scheduled to be published by COB April 19**
- Please contact FMCC@cms.hhs.gov if you have any questions about the EAPS report.

EAPS Report Updates – Released for April Report Cycle



Unmatched "F" Record	Aged Initials			Payment Dispute Submission
Apr-19	Mar-19	Apr-19	Apr-19	
✓ 0.1%	✓ 0.4%	✗ 2.0%	Submitted Recent	
✓ 0.1%	✓ 0.1%	✗ 1.5%	Did Not Submit	
✓ 0.3%	✓ 0.2%	✓ 0.0%	Submitted Recent	
✓ 0.1%	✓ 0.0%	✗ 1.2%	Submitted Recent	
✓ 0.0%	✓ 0.3%	✓ 0.0%	Did Not Submit	
✓ 0.2%	✓ 0.1%	✓ 0.0%	Submitted Recent	
✓ 0.2%	✓ 0.1%	✗ 0.8%	Submitted Recent	
✓ 0.2%	✓ 0.1%	✗ 0.8%	Submitted Recent	
✓ 0.2%	✓ 0.1%	✓ 0.0%	Submitted Recent	
✓ 0.1%	✓ 0.1%	✓ 0.5%	Submitted Recent	
✓ 0.2%	✓ 0.2%	✓ 0.0%	Submitted Recent	
✓ 0.1%	✓ 0.0%	✓ 0.0%	Submitted Recent	

Historical data in Detailed Metrics:

- Columns are collapsed and only show data from this month's report
- Clicking on the "+" at the top of the column will expand the columns showing the data from previous reports
- Column headers reflect the report that the associated data was initially published

Refresher: One_Day_Policy UIR Guidance

- ER&R has identified that issuers are submitting large numbers of One_Day_Policy “I” records.
- These One_Day_Policy records made up over 23% of the total “I” records submitted in 2019 Run 4.
- As a reminder, these “I” records can be resolved through issuer action.
- These MIEs have coverage for one day. These records are likely cancelled dependent records or extra records for the same consumer that are being reported erroneously.
- Issuer steps to resolve:
 - The issuer needs to discontinue submitting the record on the RCNI file.
 - If the policy should be effectuated for one day of coverage, please contact the ER&R Support Center at ERRSupportCenter@Cognosante.com for assistance.
- Be sure to reconcile these records in the next RCNI submissions.

AM Process for Prior Year Dispute Approval FAQ (1 of 4)

Q: How does an issuer find out who their AM is?

A: *If an issuer is unable to determine their AM through internal resources, the issuer may email their HIOS ID to the ER&R Support Center. The ER&R Support Center will provide the AM's contact information.*

Q: Do issuers submit disputes to the AMs for approval?

A: *No, issuers should not submit the actual disputes to the AMs. The issuer will email the Issuer Prior Year Approval Request Form to the AM. This form can be found on zONE here:*

<https://zone.cms.gov/system/files/documents/issuerprioryearapprovalrequest.xlsx>

Q: What are the approval criteria used by the AMs?

A: *AMs will not typically deny an approval request for prior year disputes. AMs will return Issuer Prior Year Approval Request Forms if the forms are missing information or filled out incorrectly. AMs are working to have a better understanding of the challenges that cause prior year disputes and will not reject reasonable requests that are contained within a correctly filled out form.*

Q: What is the cutoff for submitting prior year disputes without AM approval?

A: *Issuers may continue to submit prior year disputes without approval until noon ET on April 30th.*

Q: Will the AM approval process be affected by the 2016 off-cycle Reconciliation run?

A: *Yes, the issuers will be granted blanket approval for all 2016 disputes from May through September of 2019.*

AM Process for Prior Year Dispute Approval FAQ (2 of 4)

Q: What if a 2018 dispute that was submitted prior to May 1st is still “In Process” on May 1st?

A: *Approval requirement is determined based on the receipt date of the dispute. Disputes received prior to noon ET on April 30th do not require approval regardless of if they are processed by May 1st.*

Q: If a prior year dispute was unsuccessful and the issuer is working with the ER&R Support Center to correct and resubmit it, does the issuer need approval to resubmit the dispute after April 30th?

A: *Yes, disputes that are corrected and resubmitted are considered new disputes and will require AM approval if they are received after noon ET on April 30th.*

Q: Will clearinghouse/TPAs work with AMs directly to obtain approval when submitting prior year disputes on behalf of the issuers?

A: *No, the issuers are responsible for contacting the AMs for approval.*

Q: Can issuers provide multiple email addresses as their POCs?

A: *Issuers are limited to one (1) email address as the POC but are encouraged to set up their own internal email distribution group to include additional recipients.*

AM Process for Prior Year Dispute Approval FAQ (3 of 4)

Q: Which updates result in corrected 1095-A forms being automatically mailed to consumers?

A: *Corrected forms are sent to consumers if any of the following is changed:*

- *Covered individuals*
- *Consumer names*
- *Dates of coverage*
- *Premium*
- *APTC*
- *MGPI ID*

Q: Which updates do not impact a consumer's 1095-A form?

A: *Updating the following will not cause new 1095-A forms to be sent to the consumer:*

- *QHP ID*
- *CSR*
- *User Fee*
- *Agent/Broker information*
- *Gender*
- *Tobacco Status*

AM Process for Prior Year Dispute Approval FAQ (4 of 4)

Q: For issuers who submit both ERRS Enrollment Disputes and ERRP Payment Disputes, are the issuers expected to discontinue submitting ERRP Payment Disputes for prior year disputes?

A: *Once an issuer has received approval for prior year disputes, the issuer may submit both Enrollment and Payment Disputes. Because Payment Disputes are based on RCNO data that is outdated, many prior year Payment Disputes are rejected. ER&R encourages issuers to send Enrollment Disputes for the specific data elements that they are disputing.*

Q: We understand that in some scenarios ER&R routes Payment Disputes to the enrollment side. Is there any impact to this process?

A: *There is no impact to this process.*

Q: Does this impact State Based Exchange (SBE) disputes?

A: *There are currently no plans to implement this policy for SBE disputes.*

Q: When will approval be required for plan year 2019 disputes? Will it be the same in future years?

A: *Disputes will require approval as of May 1st of the subsequent year. In 2020, plan year 2019 disputes will require AM approval on May 1st.*

Q&A

