

Reinstatements via IC834

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- *New Transaction Type*
 - Issuer Reinstatement
 - *Preparing an Inbound Reinstatement*
 - *New BAA Error Codes*
 - *Example Scenarios*
 - *New Fields: PO-IC834 Report*
 - *Issuer Testing*

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IC834 – Introduction to Reinstatements

- Issuers can use an IC834 to 1) **effectuate** a policy; 2) **terminate** a policy; 3) **cancel** a policy; or 4) **update issuer assigned fields** of a policy (IC834 Maintenance)
- At present, when a policy is cancelled or terminated in the FFM, consumers must perform a change in circumstance (CIC), or Issuers must use the Reconciliation or ER&R process to reactivate coverage for the consumer
- Beginning February 2018, CMS implemented a change to allow issuers to initiate reinstatements through Inbound 834s
 - This gives Issuers the ability to send an IC834 transaction to reactivate a plan that the issuer erroneously cancelled or terminated

IC834 – Introduction to Reinstatements (Cont.)

A policy can be reinstated via IC834 if the policy is either ***cancelled*** or ***terminated*** in the FFM

		Existing Policy Status in FFM			
		Initial	Effectuated	Terminated	Cancelled
IC834	Reinstatement	Rejected	Rejected	Accepted*	Accepted*

*The IC834 Reinstatement will be successful for policies that were ended by an issuer due to non-payment, HICS, fraudulent activity, reasons of “other,” anti-duplication, free look, and out-of-area as listed in the chart to the right.

MRC (INS04)	AMRC (2750 Loop)
59	TERM
59	CANCEL
Null	TERM-OTH
Null	CANCEL-OTH
26	TERM-HICS
26	CANCEL-HICS
14	CANCEL-FLC
07	TERM-FRD
07	CANCEL-FRD
07	CANCEL-RESCIND
Null	CANCEL-ANTIDUPLICATION
Null	TERM-ANTIDUPLICATION
Null	CANCEL-OUT-OF-AREA

IC834 – Reinstatement Exceptions

- In certain scenarios, CMS requests that organizations still utilize the Automated Recon and ER&R process to submit a reinstatement:
 - Policy that has been terminated due to voluntary withdrawal
 - Subscriber who was deemed NLE, but becomes eligible for reinstatement through appeals or HICS
 - Reinstatement of policy from plan year 2017 or earlier
 - Any policy in which the termination or cancellation was not the result of issuer action (not through IC834)

IC834 – Preparing Reinstatements

- The following code combinations on an IC834 will identify the transaction as a ***Reinstatement***

IF Maintenance Type Code (INS03)	AND Maintenance Reason Code (INS04)	AND Additional Maintenance Reason Code (2750 Loop)	THEN Transaction Type (derived by FFM)
025	<i>Null*</i>	ISSUER - REINSTATEMENT	REINSTATEMENT

***The IC834 Reinstatement AMRC requires a space before and after the dash. If one or both are excluded, the transaction will be rejected.**

IC834 – Preparing Reinstatements – Sample X12

- After an IC834 is sent to terminate or cancel a policy, an Issuer can generate an IC834 X12 to reinstate coverage (**Note:** Issuers should not submit terminations and reinstatements within the same 24hr window to avoid unfavorable policy status updates)

Issuer Outbound Termination 834 (IC834)		Issuer Outbound Reinstatement 834 (IC834)
ISA*00* *00* *ZZ*D100000001 *ZZ*CMSFFM *150825*1038*A*00501*00000151*1*T~ GS*BE*12345MIO112012*MIO*20150825*1038*230*X*005010X220A1~ ST*834*1111114*005010X220A1~ BGN*00*1111114*20150825*103838*ET***2~ QTY*TO*1~ N1*P5*John*FI*123456789~ N1*IN*ABC issuer*FI*987654321~ INS*Y*18*024*59*A***TE~ REF*OF*1234567890~ REF*17*1234567890~ REF*23*2234567890~ REF*ZZ*2234567890~ REF*1L*12345678~ REF*6O*MI10000098002~ DTP*357*D8*20181031~ NM1*IL*1*Smith*John**Mr***34*123456789~ PER*IP**BN*4102223333~ DMG*D8*19720720*M*<u>RET</u>:2106-3~ LS*2700~ LX*1~ N1*75*ADDL MAINT REASON~ REF*17*TERM~ DTP*007*D8*20150901~ LX*2~ N1*75*SOURCE EXCHANGE ID~ REF*17*MIO~ DTP*007*D8*20150901~ LX*3~ N1*75*APPLICATION ID AND ORIGIN REF*6M*378492756-1	Change INS03 Change INS04 Add DTP*356 (EligibilityBeginDate) Change ADDL MAINT REASON Value for the Subscriber Remove Dependent Loop	ISA*00* *00* *ZZ*D100000001 *ZZ*CMSFFM *150825*1035*A*00501*000000149*1*T~ GS*BE*12345MIO112012*MIO*20150825*1035*228*X*005010X220A1~ ST*834*1111112*005010X220A1~ BGN*00*1111112*20150825*103538*ET***2~ QTY*TO*2~ QTY*DT*1~ N1*P5*John*FI*123456789~ N1*IN*ABC issuer*FI*987654321~ INS*Y*18*025***A***AC~ REF*OF*1234567890~ REF*17*1234567890~ REF*ZZ*2234567890~ REF*23*2234567890~ REF*6O*MI10000098002~ DTP*356*D8*20180101~ ... DTP*543*D8*20150825~ REF*1L*12345678~ REF*CE*12345MIO11201201~ REF*X9*12345673~ LS*2700~ LX*1 N1*75*ADDL MAINT REASON~ REF*17*ISSUER - REINSTATEMENT~ DTP*007*D8*20150901~ ...

IC834 – Reinstatement Errors – Invalid Policy

- The following error codes will be generated when performing an Issuer-generated reinstatement for policy mismatch:
 - Coverage year prior to 2018 for the policy of interest
 - EligibilityBeginDate within the IC834 does not match an existing FFM policy

BAA Error Codes				Rejection Reasons
Error Code	Error Reason	Element in Error	MDC	
E147	Reinstatement Transaction			Reinstatement transaction sent for a policy with 2017 coverage or earlier.
E156	Reinstatement cannot be processed as it is outside of the allocated time period			
E147	Reinstatement Transaction			Reinstatement transaction sent where the IC834 eligibilityBeginDate does not equal the FFM coverageStartDate
E046	Not Matching	EligibilityBeginDate	CoverageStartDate	
E139	Exchange Assigned			
E135	Invalid Policy ID			
E157	Coverage Start Date			

IC834 – Reinstatement Errors – Policy Not Eligible

- The following error codes will be generated when a reinstatement is sent for an initial or active policy and/or for a policy in a non-eligible terminated status:

BAA Error Codes				Rejection Reasons
Error Code	Error Reason	Element in Error	MDC	
E147	Reinstatement Transaction			Reinstatement transaction sent where the matched policy is not existing as cancelled or terminated in the FFM
E143	Action results do not match current information on file	Exchange Assigned Policy ID		
E136	Invalid Subscriber ID			
E135	Invalid Policy ID			
E147	Reinstatement Transaction			Requested 'Issuer Reinstatement' but the matched policy was not eligible for reinstatement because of no longer eligible.
E143	Action Results Do Not Match Current Information on File			
E139	Exchange Assigned	Exchange Assigned Subscriber ID		
E136	Subscriber ID			
E138	No Longer Eligible			
E147	Reinstatement Transaction			Requested 'Issuer Reinstatement' but matched policy was not eligible for reinstatement because of voluntary withdrawal.
E139	Exchange Assigned	Exchange Assigned Policy ID		
E135	Policy ID			
E152	Consumer executed voluntary withdrawal reasons			

IC834 – Reinstatement Errors – Dependents

- The following error codes will be generated when a reinstatement is sent with dependent level information
- Issuers are expected to submit only subscriber level data within IC834 reinstatements
- Please note that sending the subscriber level values alone on the IC834 does not imply that members present on the policy will remain terminated or cancelled
 - Reinstatement transactions through Inbound will effectuate the policy to include all members of the enrollment group that remained active on the policy

BAA Error Codes				Rejection Reasons
Error Code	Error Reason	Element in Error	MDC	
E147	Reinstatement Transaction			Reinstatement transaction sent for a matched policy including member-level information
E159	Dependent/Member shall not be included in Policy Level			

IC834 – Reinstatements Errors – Other

- The following error codes will be generated for an Issuer driven policy reinstatement due other reasons:
 - Gap or overlap in coverage between active policy segments for the same Policy ID or different Policy IDs for member

BAA Error Codes				Rejection Reasons
Error Code	Error Reason	Element in Error	MDC	
E147	Reinstatement Transaction			Reinstatement transaction sent for a matched policy that is not eligible because coverage was ended due to other reasons
E154	Invoke Enrollment Resolution and Reconciliation (ER&R) manual process			
E147	Reinstatement Transaction			Reinstatement would unsupersede of one or more policy segments results in a gap or overlap in coverage between active policy segments of the same Exchange Assigned Policy
E153	Unable to be processed causing a gap or overlapping in coverage dates			
E154	Invoke Enrollment Resolution and Reconciliation (ER&R) manual process			
E147	Reinstatement			Reinstatement results in an overlap in coverage for the consumer with another Exchange Assigned Policy in the same insurance line and same coverage year
E025	Duplicate Submission			
E155	Marketplace Coverage in Effect			
E154	Invoke Enrollment Resolution and Reconciliation (ER&R) manual process			

IC834 – Reinstatement Scenario 1

- **Scenario:** Issuer sends a Reinstatement IC834 for terminated FFM policy ID 2291779
 - Issuer updates the INS03, INS04, and AMRC to reflect the reinstatement
 - Issuer identifies the existing terminated FFM policy within the IC834 by updating the Exchange Assigned Policy ID and BenefitBeginDate
 - Issuer does not include dependent-level information
- **Result:** Transaction is accepted by the FFM and policy is reinstated. Coverage active from 1/1/18 – 12/31/18.

Issuer Outbound (IC834 Reinstatement)

```
ISA*00*      *00*      *ZZ*53287H      *ZZ*CMSFFM      *180124*2131*^*00501*000001658*1*T*~
GS*BE*76168DE0410010*DE0*20180124*2131*11307*X*005010X220A1~
ST*834*130063*005010X220A1~
-----
INS*Y*18*025**A***AC~
REF*0F*0000785249~
REF*17*0000785249~
REF*6O*DE00001021762~
DTP*356*D8*20180101~
-----
DTP*348*D8*20180101~
REF*1L*2291779~
REF*X9*91279~
-----
N1*75*APTC AMT~
REF*9V*637.00~
DTP*007*D8*20180101~
-----
N1*75*ADDL MAINT REASON~
REF*17*ISSUER - REINSTATEMENT~
LE*2700~
SE*61*130063~
GE*1*11307~
IEA*1*000001658
```

IC834 – Reinstatement Scenario 2

- Reinstatement processing effectuates previously terminated or cancelled policies from 1/1 to 12/31 of the coverage year associated with the policy
- If an Issuer wishes to truncate the period of coverage, an Issuer can set an earlier end date (before 12/31) through an IC834 termination transaction after the policy has been reinstated
- **Scenario:** Issuer sends IC834 reinstatement and termination transactions for policy 3391779 to set a non-12/31 end date
- **Result:** Policy 3391779 is effective 1/1/2018 – 5/31/2018

Issuer Outbound (IC834 Reinstatement)

```

ISA*00*      *00*      *ZZ*53287H      *ZZ*CMSFFM      *180124*2131*^*00501*000001658*1*T*:~
GS*BE*76168DE0410010*DE0*20180124*2131*11307*X*005010X220A1~
ST*834*130063*005010X220A1~
-----
INS*Y*18*025**A***AC~
REF*OF*0000785249~
REF*17*0000785249~
REF*6O*DE00001021762~
DTP*356*D8*20180101~
-----
DTP*348*D8*20180101~
REF*1L*3391779~
REF*X9*91279~
-----
N1*75*APTC AMT~
REF*9V*637.00~
DTP*007*D8*20180101~
-----
N1*75*ADDL MAINT REASON~
REF*17*ISSUER - REINSTATEMENT~
LE*2700~
SE*61*130063~
GE*1*11307~
IEA*1*000001658
  
```

Issuer Outbound (IC834 Termination)

```

ISA*00*      *00*      *ZZ*53287H      *ZZ*CMSFFM      *180124*2131*^*00501*000001658*1*T*:~
GS*BE*76168DE0410010*DE0*20180124*2131*11307*X*005010X220A1~
ST*834*130063*005010X220A1~
-----
INS*Y*18*024*59*A***TE~
REF*OF*0000785249~
REF*17*0000785249~
REF*23*0000785249~
REF*ZZ*0000785249~
REF*1L*3391779~
REF*6O*DE00001021762~
DTP*357*D8*20180531~
-----
N1*75*ADDL MAINT REASON~
REF*17*TERM~
LE*2700~
SE*61*130063~
GE*1*11307~
IEA*1*000001658
  
```

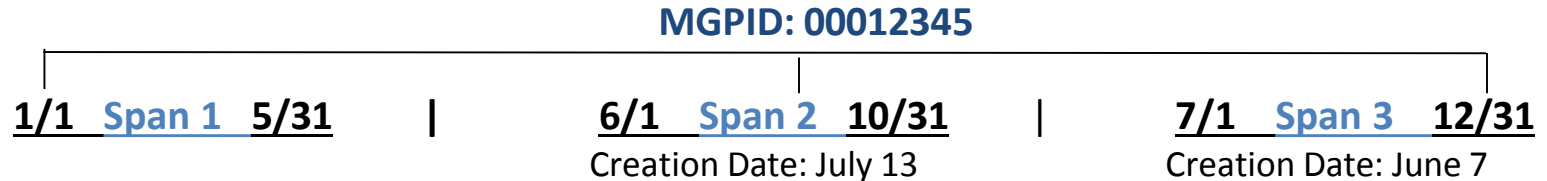
IC834 – Reinstatement Scenario 3

- Reinstatements sent via IC834 activate the policy back to its original period of coverage (entire calendar year)
- Issuers sending IC834 reinstatements must use the initial start date for the policy; submitters are not permitted to update policy start dates through IC834
- **Scenario:** Issuer sends an IC834 reinstatement transaction wherein Benefit Begin Date is:
 - Missing or;
 - Is later than the FFM Coverage Start Date for the eligible policy
- Transaction is rejected with **E147** “Reinstatement Transaction,” **E046** “Not Matching,” **E139** “Exchange Assigned,” **E135** “Invalid Policy ID,” **E157** “Coverage Start Date”

Issuer Outbound (IC834 Reinstatement)

```
ISA*00*          *00*      *ZZ*53287H      *ZZ*CMSFFM      *180124*2131*^*00501*000001658*1*T*:~
GS*BE*76168DE0410010*DE0*20180124*2131*11307*X*005010X220A1~
ST*834*130063*005010X220A1~
-----
INS*Y*18*025**A***AC~
REF*0F*0000785249~
REF*17*0000785249~
REF*6O*DE00001021762~
DTP*356*D8*20180601~
-----
DTP*348*D8*20180601~
REF*1L*4491779~
REF*X9*91279~
-----
N1*75*APTC AMT~
REF*9V*637.00~
DTP*007*D8*20180101~
-----
N1*75*ADDL MAINT REASON~
REF*17*ISSUER - REINSTATEMENT~
LE*2700~
SE*61*130063~
GE*1*11307~
IEA*1*000001658
```

IC834 – Reinstatement Scenario 4 (Multiple Spans)



If there is a financial, enrollment group size, or other change associated with a terminated or cancelled FFM policy, the IC834 reinstatement transaction will be accepted if:

- BenefitBeginDate reflect the start date for the initial policy ***if the changes did not result in a new Exchange Assigned Policy ID***

Scenario:

- Consumer enrolls in coverage at the beginning of the year to have coverage effective 1/1 (Coverage Span 1)
- On June 7, the consumer then attests to a financial change with a SEP that creates new segment of coverage 7/1 (Coverage Span 3)
- The consumer comes back on July 13, and adds a newborn baby to coverage with a birthdate of 6/1 (Coverage Span 2)
- The Issuer then erroneously terminates coverage effective 10/31 via IC834
- Issuer sends IC834 reinstatement transaction with Benefit Begin Date of 1/1 for the associated policy to reactivate coverage
 - Transaction is accepted and updates the FFM to effectuate the policy from 1/1 to 12/31

IC834 – Reinstatement Scenario 5 (Members)

- Issuers are expected to submit only subscriber level data within IC834 reinstatements

MGPID: 00123456

1/1 Span 1 7/31

8/1 Span 2 12/31

Creation Date: August 3
- **Scenario:**
 - Consumer enrolls during Open Enrollment for coverage effective 1/1 (Span 1)
 - On August 3, the consumer then enrolls a dependent creating a new segment with 2 members starting 8/1 (Span 2)
 - Policy inadvertently terminated via IC834 due to other reasons (MRC TERM-OTH) with end date of 9/30
- **Attempt 1:** Issuer sends IC834 reinstatement transaction including both subscriber- and dependent-level information with BenefitBeginDate of 1/1
 - Issuer receives a TR with E147 “Reinstatement Transaction” and E159 “Dependent/Member shall not be included in Policy Level”
 - In order to reinstate coverage for non-subscriber members alone, Issuers should continue to leverage the Recon or ER&R process
- **Attempt 2:** Issuer sends IC834 reinstatement transaction with eligible subscriber information with BenefitBeginDate of 1/1
 - Issuer receives a TA and the policy is effectuated from 1/1 – 12/31

IC834 – Reinstatement Scenario 6 (Coverage Dates)

- Reinstatement transactions are accepted via IC834 if the Issuer provides values to activate the policy back to its original period of coverage (entire calendar year)
- Issuers sending IC834 reinstatements **must use** the initial start date for the policy
 - **NOTE:** Issuers are **not** permitted to update policy start dates (BenefitBeginDate) through IC834 for any transaction



- **Scenario:** Issuer sends an IC834 reinstatement transaction for eligible policy wherein Benefit Begin Date is:
 - Missing or;
 - Is later than the FFM Coverage Start Date for the eligible policy (IC834 BenefitBeginDate = 5/1)
- Transaction is rejected with E147 “Reinstatement Transaction,” E046 “Not Matching,” E139 “Exchange Assigned,” E135 “Invalid Policy ID,” E157 “Coverage Start Date”

IC834 – Reinstatements – PO Reports

- Currently, if you send reinstatement transactions to the FFM, the PO Summary and Detailed report will display these records as below:
 - PO Summary Report
 - Reinstatement transactions will be counted as transaction type “Undefined”
 - Counts of any transaction(s) receiving the new error codes will be displayed within the existing “Other” column

					Transaction Details					Primary Matching Rejection Errors			Secondary Matching Rejection Errors*					
Issuer Details					Transaction Counts					Policy Identification			Business Processing Rules					
Year	HIOS	Issuer Name	State	TPID	Transaction Type	% Accepted	Total	Accepted	Rejected	Invalid/Missing Mandatory Fields	4 Key Mis-Match	Invalid Transaction Type	Secondary Fields Mis-Match	Invalid Date	Invalid Policy Status Update	Duplicate Policy Status Update	Other	Warning
2018	XXX	ABC Organization	VA	XXX	CANCELLATION	50.00%	2	1	1	0	1	0	0	0	0	0	0	0
2018	XXX	ABC Organization	VA	XXX	EFFECTUATION	0.00%	1	0	1	0	0	1	0	0	0	0	0	0
2018	XXX	ABC Organization	VA	XXX	TERMINATION	33.33%	6	2	4	0	0	0	4	0	0	0	0	0
2018	XXX	ABC Organization	VA	XXX	UNDEFINED	50.00%	10	5	5	0	0	0	0	1	1	0	3	0

- In the PO Detailed Reports (OP834T)
 - All submitted reinstatement transactions will be visible with Trans_Type “Undefined,” BAA errors and description will be displayed for rejected transactions

IC834 – Reinstatements – Issuer Testing

- For Issuers who wish to test the new transaction type:
 - Request Issuers send email with subject “Inbound Reinstatements Testing: [HIOS ID]” to Inbound834@bah.com
 - The IC834 team will provide support as needed throughout your organization’s testing process

IC834 – Resources

- ASC X12 Companion [Guide](#)
 - Last updated: 05/28/2019
 - Includes information on Inbound Reinstatements
- IC834 [Education Suite](#)
 - 101, 201, and 301 Decks
- Other FAQs
 - [CMS Issuer Technical Workgroup Presentations](#)
 - [EDI Onboarding](#)
 - [EFT File Naming Guidelines](#)