

State Based Exchange (SBE) Issuer Meeting



September 6, 2019

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Agenda

- General Updates
- Updated Interface Control Document (ICD)
- Payment Disputes Best Practices
- Production Payment Cycle Files Update
- Reference Documents
- Q&A

General Updates

General Updates

- The next issuer meeting will be held on October 4, 2019.
- Please contact Financial Management Coordination Center (FMCC) (fmcc@cms.hhs.gov) for the following issues:
 - If anyone has any topics they would like to cover in a future issuer call
 - SBE Issuer contact updates
- If you have any ingestion or data issues, please email the Federal Exchange Program System (FEPS) Help Desk at CMS_FEPS@cms.hhs.gov as soon as possible.

Updated Interface Control Document (ICD)

EPS Extract Schema Change

- CMS is making a small modification to the EPS Extract schema
 - Removing State specific limitation to StateCd
- Changed to:

```
<xs:element name="StateCd">
  <xs:simpleType>
    <xs:restriction base="xs:string">
      <xs:maxLength value="2"/>
      <xs:minLength value="2"/>
      <xs:pattern value="[A-Z][A-Z]"/>
    </xs:restriction>
  </xs:simpleType>
</xs:element>
```

- Change effective as of October submission for the November payment cycle

Note: This change should have no impact to current builds, but provides CMS greater flexibility to transition new SBEs

EPS Extract Function Code

- CMS is updating the EPS Extract Function Code.
 - From: EPSEXT
 - To: SBEX99 (where 99 = last two digits of Plan Year)
 - For example: SBEX18 = function code of EPS extract for plan year 2018.
- Rationale:
 - Name change to SBEX to identify the extract belongs to SBE vs. FFE
 - Identifies plan year within the file name eliminating the need to stagger transmission of files
 - Allows CMS to run the extract job for all plan years simultaneously
 - Allows CMS to send extracts for multiple plan years on a single day
 - Does not unduly delay disputes processing
- Change effective in December 2019 for January 2020 payment cycle EPS Extract.

Payment Disputes Best Practices

Submitting Payment Disputes

CMS established the SBE Payment Dispute process to allow SBE Issuers to dispute discrepancies with the monthly payments as part of the Policy-Based Payment process.

- The payment dispute process allows Issuers to identify missing, unexpected, and/or incorrect payments. Issuers may dispute coverage start date and end date, total premium, APTC amount, and advance CSR amount for any policy level payment data found on a PPR or HIX-820 that disagrees with the Issuer's data.

The SBE dispute process serves several important functions:

- **Identifies payment discrepancies and CMS processing issues**
- **Helps Issuers identify errors in PPR or 820 file processing**
- **Identifies timing issues**
 - Note: Issuers can also review the most recent EPS Extract to determine timing issues.
- **Notifies CMS of persistent enrollment discrepancies**

Persistent Disputes

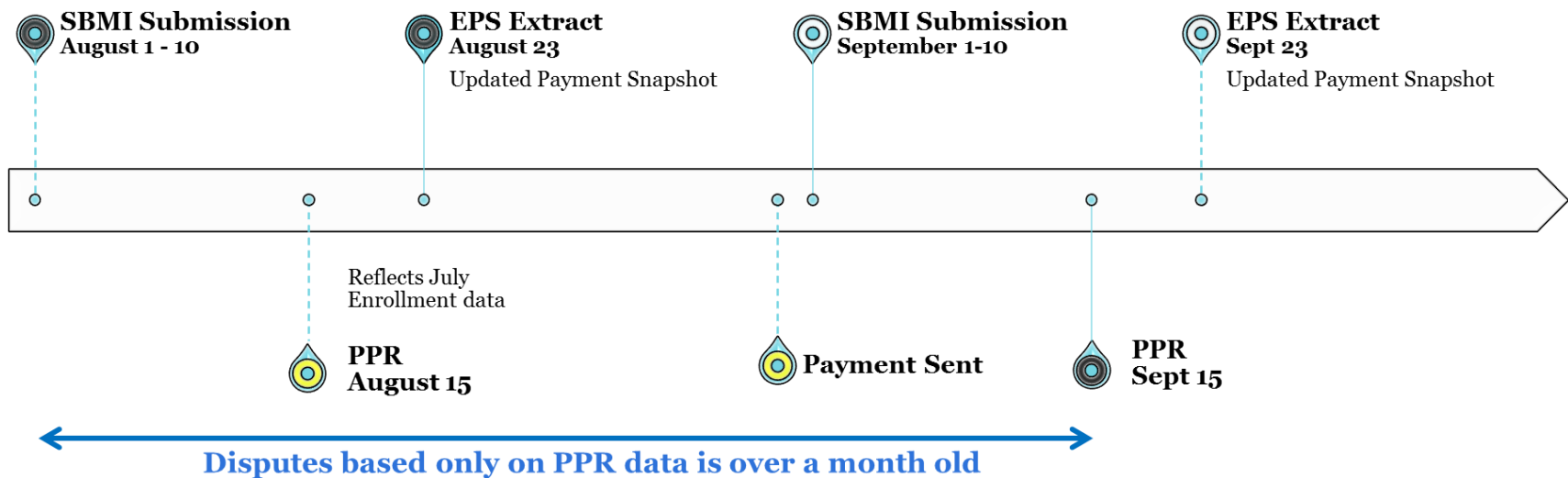
- Persistent disputes are identified through the disputes process that have been previously identified by an earlier month's disputes.
 - They may indicate a policy or group of policies that are not being resolved through normal issuer and SBE reconciliation processes.
- CMS will track persistent disputes and provide support and technical assistance to help remedy ongoing issues if requested.
 - CMS may review persistent dispute cases with SBEs to discover the root causes behind the discrepancies.
- Without submission of disputes, CMS has no insight into the quality of reconciliation efforts between the issuer and their SBE.

Utilizing the EPS Extract

- The Enrollment Payment System (EPS) Extract is an XML file from the CMS EPS database that serves as a snapshot (that includes a complete history for a coverage year) of the policy-level enrollment data. This data will serve as the basis for APTC and advance CSR payments for the current payment cycle.
 - Also includes information about any policy-level errors or warnings that were generated from the most recent submission of the SBMI file in the current payment cycle.
- Benefits of reviewing and utilizing the EPS Extract:
 - The EPS extract provides Issuers insight into the state of a policy
 - Enhance reconciliation processes with insight into data CMS has successfully received from SBE
 - Clear picture of financial state for the payment cycle
 - Identify policies that could have been rejected for errors
 - Identify timing issue disputes
 - Issuers can ignore disputes that are timing issues; reducing volume of discrepancies
 - Allows Issuers to focus on issues that won't be resolved over time

Timing Example

- Payments are generated over a month after the submission of the SBMI data.
 - Information submitted by the 10th of one month does not appear on the PPR or HIX820 until late in the following month.
 - This means that by the time an Issuer has the files necessary to submit a dispute (i.e., PPR or HIX820) the SBE has already submitted a new SBMI
 - The EPS extract is generated approximately 2 weeks after the SBMI submission, and approximately 3 weeks prior to the associated PPR and HIX 820.
 - By utilizing the latest EPS extract to confirm discrepancies, an Issuer could eliminate disputing discrepancies that have already been corrected in the EPS database.



Production Payment Cycle Files Update

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PROD Cycle Milestones September 2019 – November 2019

PROD Cycle Milestones	September Payment Cycle	October Payment Cycle	November Payment Cycle
SBE Submission Window	8/1 – 8/10	9/1 – 9/10	10/1 – 10/10
CMS Freeze Period	8/11 – 8/15	9/11 – 9/15	10/11 – 10/15
Transmit EPS Extracts to SBEs & Issuers for 2019	8/22	9/23	10/23
Transmit EPS Extracts to SBEs & Issuers for 2018	8/23	9/24	10/24
1A Manual Workbook Submission*	8/16 – 8/20	9/16 – 9/18	10/16 – 10/18
SBE Dispute Disposition Report (DDR+) transmitted	NLT 9/5	NLT 10/7	NLT 11/5
Transmit 820 PPR to SBEs & Issuers	NLT 9/15	NLT 10/15	NLT 11/15
Treasury Funds Transmittal	9/20	10/21	11/21
Transmit HIX 820 to Issuers	NLT 9/30	NLT 10/31	NLT 11/30

*If applicable

Key: Milestone Completed

Reference Documents

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
 - SBE Issuer PBP FAQs
 - SBE Payment Disputes Technical Reference Guide
 - Issuer Dispute Form
 - SBE Disputes Disposition and Detail Code List
 - Previous Issuer Meeting Presentation Slides
 - CMS HIX820 Companion Guide

Q&A

Questions?

