

Subscriber ID Inheritance Issue Guidance

- FFM has received incident tickets regarding the reassignment of the Exchange-assigned Subscriber ID to a spouse or dependent who becomes the subscriber on a given account.
- In other words, it appears that two different people are sharing the same Exchange-assigned ID across different periods of time.

Example:

- Family enrolled with husband as the subscriber (sent with Exchange-assigned ID 0000000123) and wife as a dependent (sent with Exchange-assigned ID 0000000456)
- The husband ages into Medicare and attempts to terminate himself from the policy but retain coverage for his wife on the same application
- An M834 is generated with the wife's information under the husband's Exchange-assigned ID of 0000000123 and the removal of dependent 0000000456

Subscriber ID Inheritance Issue (continued)

- FFM has a known limitation where it does not support changing the household contact.
- Recent fixes have minimized the frequency and impact of this limitation, but it can still occur in rare situations.
- Future fixes to support changing the household are in discussion.

The screenshot displays the CMS Marketplace enrollment interface. On the left is a navigation sidebar with the following items: 'GET STARTED' (with a plus icon), 'Privacy policy' (with a checkmark icon), '2 Contact information' (highlighted with a blue bar and the number 2), '3 Help applying for coverage', '4 Help paying for coverage', and 'Who needs coverage'. Below these is a section for 'FAMILY & HOUSEHOLD' with a plus icon. The main content area is titled 'Contact information' in a blue header. Below the header, it states: 'If the Marketplace has your email address, we'll automatically send you important information, updates, and reminders about Marketplace enrollment. You can opt out of these communications at any time. To do this, click on the "unsubscribe" link in the footer of any Marketplace email.' Below this text is a form field containing the text 'john smith', '123 main st', and 'falls church, VA 22043'. To the right of this text is a red-bordered button labeled 'UPDATE NAME'. To the right of the main content area is a light blue box with the text 'Change the spelling of john smith's name. Don't enter a different person.' Below this box is a form with four fields: 'First name' (containing 'mary'), 'Middle optional' (empty), 'Last name' (containing 'smith'), and 'Suffix optional' (a dropdown menu with 'Select...' and a downward arrow). Below these fields are two buttons: 'CANCEL' and 'SAVE'.

Subscriber ID Inheritance Issue (continued)

- Common permutations of the issue include:
 - The original subscriber being added back to the application with a new Exchange-assigned ID
 - The original subscriber starting a new application and receiving a new Exchange-assigned ID
 - Some combination of the demographic information being incorrect for one or both of the members sharing an ID across periods of time on an application

Subscriber ID Inheritance Issue (continued)

- In response to these tickets, CMS has attempted outreach to affected members to have them come back to the FFM and create new applications.
- The success rate for outreach however has been very low.
- Additionally, realigning the Exchange-assigned IDs back to the original identities is not possible with current tools.

Subscriber ID Inheritance Issue (continued)

- In order to resolve these tickets, CMS is recommending several strategies:
 - Apply edits to effective date each identity assigned to the Exchange-assigned ID across different enrollment periods, mirroring the FFM data.
 - If this is not possible, use only the latest Exchange-assigned sent for each identity.
 - If an affected member has been removed and therefore not assigned a new Exchange ID, use a placeholder ID.
 - If there is a premium discrepancy due to a new start date not being established when the subscriber changed, submit an issuer dispute to ER&R.
 - If the demographic information for one of the members is not correct, i.e. the name, SSN, and/or DOB are not all consistent, note this in the Help Desk ticket so that Marketplace can perform outreach to the consumer to correct their information.

Example Scenario

- In this scenario, a subscriber (John Doe) and his wife (Jane Doe) have enrolled with a 1/1/2017 Benefit Start Date
 - John's initial FFM Member ID is **0000000123**
 - Jane's initial FFM Member ID is **0000000456**
- Effective April 1st, John is removed from the policy leaving only Jane – however this was done by overwriting John's contact information on the application with Jane's resulting in her "inheriting" his Exchange-Assigned Member ID
 - Jane's FFM Member ID changed April 1 to **0000000123**

Reporting in Reconciliation

- There are several ways Issuers can manage this situation in their system and reflect back to CMS on the RCNI File
- Option 1: Associate different IDs with different time spans

Member Name	Exchange-Assigned Sub ID	Exchange-Assigned Member ID	Subscriber Indicator	Benefit Start Date	Benefit End Date
John Doe	0000000123	0000000123	Y	1/1/2017	3/31/2017
Jane Doe	0000000123	0000000456	N	1/1/2017	3/31/2017
Jane Doe	0000000123	0000000123	Y	4/1/2017	12/31/2017

- This approach best aligns with the way FFM maintains enrollment data and would produce the cleanest results in reconciliation matching
- All fields shown above would match between the FFM and Issuer if submitted in this fashion

Reporting in Reconciliation

- Option 2: Use the latest Exchange-Assigned Member ID sent by the FFM for each individual

Member Name	Exchange-Assigned Sub ID	Exchange-Assigned Member ID	Subscriber Indicator	Benefit Start Date	Benefit End Date
John Doe	0000000123	0000000123	Y	1/1/2017	3/31/2017
Jane Doe	0000000123	0000000123	N	1/1/2017	3/31/2017
Jane Doe	0000000123	0000000123	Y	4/1/2017	12/31/2017

- In this case, the reconciliation process will rely on demographic information to match the “Jane” record appropriately for the 1/1-3/31 span as all IDs are the same
- This will result in an “I” flag on the Exchange-Assigned Member ID field, requesting the Issuer update to the FFM’s **0000000456** value for that span

Reporting in Reconciliation

- Option 3: Use a placeholder ID for the member removed from the policy whose ID was “inherited”

Member Name	Exchange-Assigned Sub ID	Exchange-Assigned Member ID	Subscriber Indicator	Benefit Start Date	Benefit End Date
John Doe	9999999123	9999999123	Y	1/1/2017	3/31/2017
Jane Doe	9999999123	0000000123	N	1/1/2017	3/31/2017
Jane Doe	0000000123	0000000123	Y	4/1/2017	12/31/2017

- In this case, the reconciliation process will rely on demographic information to match both records in the first span as the Exchange-Assigned Subscriber ID no longer matches and a placeholder ID is used for John
- This will result in an “I” flag on both Exchange-Assigned IDs for John, the Exchange-Assigned IDs for Jane in the 1/1-3/31 span as neither match the FFM IDs