

UIR Master Guidance

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Revision History

Version	Change Date	Author	Change Reason/Description
3.0	02/28/2019	CMS and ER&R	2019 Baseline - Slide 24: Included details regarding new function code format and inserted link to Data Reconciliation Calendar page on CMS zONE - Slide 28: Included projected timeframe for manual payments to issuers and updated “current year” references for clarity - Slide 29: Updated “current year” references for clarity - Slide 32: Inserted note regarding FFM_Enrollment_Blocker UIEs receiving manual Form 1095-As - Slide 33: Inserted 2018 Manual 1095-A and Payment Timeline slide - Removed 2017 UIE Appendix - Minor updates to formatting and language for consistency throughout
3.1	05/17/2019	CMS and ER&R	- Slides 5, 9: Inserted new categories - Slide 21: Updated field names to match UIR Report headers - Slide 23: Updated title to remove year reference and inserted 2019 UIE details - Created 2018 and 2019 UIE Policy Guidance sections - Minor updates throughout - Inserted the following new slides: - Terminated_Prior_Year Category - Terminated_Prior_Year_BAR_Failure Category - Terminated_Persistent_UIE Category - Deleted the following slides: - Prior_Year_BAR_Failure_Category - Enrollment_Not_Valid Category - Persistent_UIE Category - Dental_Prior_Year Category - UIR Category Updated: Dependent_Removed

Revision History (Cont.)

Version	Change Date	Author	Change Reason/Description
3.2	08/15/2019	CMS and ER&R	- Removed 2018 UIE Appendix - Slide 23: Included additional details regarding UIR9 function code format - Throughout: Removed references to ERRUIR function code - Minor updates to formatting and language for consistency throughout
3.3	11/29/2019	CMS and ER&R	- Slide 4: Updated UIR Report bullet - Slide 7: Updated data matching information - Slides 16–18: Changed to past tense - Removed UIR Report slide, formally slide 19 - Slide 22: Added 2020 function code bullet
4.0	02/20/2020	CMS and ER&R	- Slide 6: Added FFM_Updates_Processing category - Slide 13: Added FFM_Updates_Processing category - Deleted the following slides: - Terminated_Prior_Year Category - Terminated_Prior_Year_BAR_Failure Category - Terminated_Persistent_UIE Category - Inserted new slide 16: FFM_Updates_Processing Category

Unaffiliated Issuer Enrollment Guidance

CMS's terminology and guidance regarding Unaffiliated Issuer Enrollments (UIEs) provides specific categorization, allowing for clearly defined steps for resolving unmatched "I" records.

- ***Unmatched "I" Record (UIR):*** An "I" record in which the Reconciliation process is unable to match the issuer-reported record to a Federally-Facilitated Marketplace (FFM) record. UIRs include:
 - ***Misaligned Issuer Enrollments (MIE):*** An issuer record that is not directly matched with an FFM record through the Data Reconciliation process, but, after additional analysis, appears to be an FFM match; issuer action is still needed to bring the record into alignment
 - ***Unaffiliated Issuer Enrollment (UIE):*** An issuer record that is not matched with an FFM record and the UIR analysis process is unable to identify an FFM record for the consumer

CMS provides regular UIR Reports: After each RCNO run, the UIR Report provides impacted issuers with a list of "I" records in the run and guidance for resolving each record.

UIR Report Guidance Buckets

UIRs will each fall into a specific primary guidance bucket. These guidance buckets are grouped based on the action needed to resolve the "I" record.

The guidance buckets are as follows:

- ***Issuer Action Required – Reconciliation:*** The issuer may resolve the UIR by updating values in RCNI or discontinuing the reporting of an invalid record.
- ***Issuer Action Required – Consumer Outreach:*** The member does not have an active current year enrollment. The issuer needs to complete outreach to ask the member to contact the Marketplace to complete an enrollment. In certain scenarios, the consumer's Marketplace account will be tagged with a Special Enrollment Period (SEP).
- ***Issuer Action Required – Enrollment Dispute to Be Submitted:*** The issuer must submit an Enrollment Dispute to resolve the UIR.
- ***No Issuer Action Needed:*** These include UIRs that are in process for further research, UIRs that are allowed to persist, and UIRs resulting from a timing issue between the Pre-Audit and RCNI.

UIR Reporting Categories

UIR Type	UIR Report Data Categories	UIR Guidance Bucket
UIE	Ineligible_Newborns	No Issuer Action Needed
UIE	FFM_Timing_Issue	No Issuer Action Needed
UIE	FFM_Updates_Processing	No Issuer Action Needed
UIE	FFM_Enrollment_Blocker	Issuer Action Needed – ER&R Dispute to Be Submitted
UIE	Prior_Year	Issuer Action Needed – Consumer Outreach
UIE	Prior_Year_BAR_Failure	Issuer Action Needed – Consumer Outreach
UIE	Persistent_UIE	Issuer Action Needed – Consumer Outreach
UIE	No_Records_Found	Issuer Action Needed – Reconciliation and/or Consumer Outreach
UIE	Dental_Prior_Year	Issuer Action Needed – Reconciliation
UIE	Terminated_Prior_Year	Issuer Action Needed – Reconciliation
UIE	Terminated_Prior_Year_BAR_Failure	Issuer Action Needed – Reconciliation
UIE	Terminated_Persistent_UIE	Issuer Action Needed – Reconciliation
MIE	One_Day_Policy	Issuer Action Needed – Reconciliation
MIE	Cross_HIOS	Issuer Action Needed – Reconciliation
MIE	Dependent_Removed (Previously Prior_Year_Dependent_Removed)	Issuer Action Needed – Reconciliation
MIE	Consumer_Initiated_Cancellation	Issuer Action Needed – Reconciliation
MIE	Reinstatement_Needed	Issuer Action Needed – ER&R Dispute to Be Submitted
MIE	Ineligible_PPI_PD, Zero_PRM_AMT	Issuer Action Needed – Reconciliation
MIE	Matched_SBR_Null, Matched_SBR_Mismatch, Matched_BENE_Null, Matched_BENE_Mismatch, Matched_SBR_BENE_Mismatch, Matched_SBR_BENE_Null, Matched_SBR_Ind_Change, Invalid_Demographics	Issuer Action Needed – Reconciliation
MIE	Enrollment_Not_Valid	Issuer Action Needed – Reconciliation
In Process	In_Process	No Issuer Action Needed

UIR Type

☐ UIE

☐ MIE

☐ None (In Process)

UIR Guidance Type

☐ Issuer Action Needed

☐ No Issuer Action Needed

Data Reconciliation Matching Review

For proper record matching during the Reconciliation process, one (1) of the following sets of elements provided by the issuer must match the FFM values:

- Last name
- Date of birth
- Line of Business
- HIOS ID

Or:

- Exchange-Assigned Subscriber ID
- Exchange-Assigned Member ID
- Line of Business
- HIOS ID

If neither of these sets of values match, the issuer may get an “I” record on the UIR Report that will require action.

UIR Issuer Action Required – Reconciliation

UIR Report Category	Definition	Tip For Resolution
Ineligible_PPI_PD	This MIE has an Issuer Premium Paid Indicator not equal to "Y," so there is no effectuation action to take in the FFM.	If the policy should be effectuated, the issuer needs to update the Initial Premium Paid Indicator to "Y."
One_Day_Policy	This MIE has coverage for one day. This record is likely a cancelled dependent record or an extra record for the same consumer that is being reported erroneously.	The issuer needs to discontinue submitting this record on the RCNI file. If this policy should be effectuated for one day of coverage, please contact the ER&R Support Center at ERRSupportCenter@Cognosante.com for assistance.
Zero_PRM_AMT	This MIE has a \$0 Total Premium Amount on the subscriber record for the issuer.	If the policy is valid, the issuer needs to update the Total Premium Amount.
Cross_HIOS	This category appears when the consumer associated to the issuer record in the RCNO has active coverage with a different HIOS for the same or overlapping coverage period.	The issuer needs to discontinue submission on the RCNI file.
Matched_SBR_BENE_NULL	This category appears when the issuer record can be associated to an FFM record for the consumer in the RCNO file; however, the issuer is sending null/zero, or blank values for the FFM Exchange-Assigned Subscriber ID and Member ID.	The issuer needs to update the FFM Exchange-Assigned Subscriber ID and Member ID on the RCNI file to match the FFM Exchange-Assigned Subscriber ID and Member ID for the FFM record.
Matched_SBR_BENE_Mismatch	This category appears when the issuer record can be associated to an FFM record for the consumer in the RCNO file; however, the issuer is sending different values for the FFM Exchange-Assigned Subscriber ID and Member ID than the FFM.	The issuer needs to update the FFM Exchange-Assigned Subscriber ID and Member ID on the RCNI file to match the FFM Exchange-Assigned Subscriber ID and Member ID for the FFM record.
Matched_SBR_NULL	This category appears when the issuer record can be associated to an FFM record for the consumer in the RCNO file; however, the issuer is sending null/zero or blank values for the FFM Exchange-Assigned Subscriber ID.	The issuer needs to update the FFM Exchange-Assigned Subscriber ID on the RCNI file to match the FFM Exchange-Assigned Subscriber ID for the FFM record.

UIR Issuer Action Required – Reconciliation (Cont.)

UIR Report Category	Definition	Tip For Resolution
Matched_SBR_Mismatch	This category appears when the issuer record can be associated to an FFM record for the consumer in the RCNO file; however, the issuer is sending different values for the FFM Exchange-Assigned Subscriber ID than the FFM.	The issuer needs to update the FFM Exchange-Assigned Subscriber ID on the RCNI file to match the FFM Exchange-Assigned Subscriber ID for the FFM record.
Matched_BENE_NULL	This category appears when the issuer record can be associated to an FFM record for the consumer in the RCNO file; however, the issuer is sending null/zero or blank values for the FFM Exchange-Assigned Member ID.	The issuer needs to update the FFM Exchange-Assigned Member ID on the RCNI file to match the FFM Exchange-Assigned Member ID for the FFM record.
Matched_BENE_Mismatch	This category appears when the issuer record can be associated to an FFM record for the consumer in the RCNO file; however, the issuer is sending different values for the FFM Exchange-Assigned Member ID than the FFM.	The issuer needs to update the FFM Exchange-Assigned Member ID on the RCNI file to match the FFM Exchange-Assigned Member ID for the FFM record.
Dependent_Removed NOTE: In reports issued prior to December 2017, this category was named Prior_Year_Dependent_Removed.	This category appears when the dependent was removed from the application.	The issuer will need to reconcile their system to align with the FFM enrollment. The issuer needs to update their records on RCNI to no longer report the dependent. If the issuer has a HICS case supporting the continued enrollment for the dependent, contact the ER&R Support Center at ERRSupportCenter@cognosante.com .
Invalid_Demographics	This category appears when the issuer record can be associated to a record in the RCNO file; however, the issuer is submitting invalid demographic information.	The issuer needs to update the demographics on the RCNI file to match the FFM record.
Consumer_Initiated_Cancellation	This MIE category is applied when there is evidence that the consumer initiated a cancellation or a termination within the UIR HIOS in the previous year. At the same time, the consumer switched to a different HIOS. As a result of the consumer's action, the "I" record is invalid.	The issuer needs to discontinue submitting this record on the RCNI file. To the dispute the category, please contact the ER&R Support Center at ERRSupportCenter@cognosante.com .

UIR Issuer Action Required – Reconciliation (Cont.)

UIR Report Category	Definition	Tip For Resolution
Matched_SBR_Ind_Change	This category appears when the issuer record can be associated to an FFM record for the consumer in the RCNO file; however, the Subscriber Indicator for the consumer is not the same as the FFM.	For subscriber/dependent switch scenarios, issuers should follow previously provided guidance and monitor the RCNO to verify it is corrected. Issuers are usually notified directly when the subscriber has been corrected. In all other scenarios, issuers should update their system to the correct subscriber.
Enrollment_Not_Valid	This category is applied when analysis of the issuer enrollment record concludes that the enrollment for the consumer is not valid.	The issuer needs to discontinue submitting this record on the RCNI file. If the issuer considers the “I” record to be valid, please contact the ER&R Support Center at ERRSupportCenter@Cognosante.com .
Dental_Prior_Year	This UIE category is applied to current year “I” records when the FFM indicates that there is no valid Stand Alone Dental Plan (SADP) enrollment for the current year, but there is an SADP enrollment for a prior year.	The issuer needs to discontinue submitting this record on the RCNI file. If the member(s) is active within the issuer system, offer the enrollee(s) an off-Marketplace plan.
Terminated_Prior_Year	This category is applied when the FFM indicates that there is no enrollment for the current year, but the issuer is reporting a current year enrollment. The “I” record is reporting a current year enrollment that is set to be terminated prior to 12/31 when the most recent enrollment within the FFM is for a prior year.	The issuer will need to continue submitting this record on the RCNI file to receive manual payment in accordance with the manual payment guidance published by CMS. These UIEs are not eligible for an SEP.
Terminated_Prior_Year_BAR_Failure	This category is applied when the issuer’s record is related to a prior year enrollment that is part of the CMS BAR Failure Report. Subsequently, the member was not rolled over during BAR. The issuer is reporting a current year enrollment that is terminated prior to 12/31 within the RCNO file.	The issuer will need to continue submitting this record on the RCNI file to receive manual payment in accordance with the manual payment guidance published by CMS. These UIEs are not eligible for an SEP.
Terminated_Persistent_UIE	This category is applied to current year “I” records that were reported as Prior_Year “I” records in the previous coverage year. The “I” record was terminated prior to 12/31 within the current year.	The issuer will need to discontinue submitting this record on the RCNI file. These UIEs are not eligible for an SEP or manual payment.

UIR Issuer Action Required – Consumer Outreach

UIR Report Category	Definition	Tip For Resolution
Prior_Year	This category appears when the FFM indicates there is no valid enrollment for the current year. The most recent enrollment within the FFM was for a prior year.	The issuer needs to perform consumer outreach to ask the member to contact the Marketplace to complete an enrollment. The Marketplace account will be tagged with an SEP. The issuer does not need to perform consumer outreach if the coverage is already terminated.
No_Records_Found	This category appears when the issuer record cannot be associated to an application or an FFM enrollment record.	This category may include scenarios where the issuer submitted test data or records for non-Marketplace policies. In these scenarios, the issuer needs to discontinue submission on RCNI. If the issuer believes this is a valid Marketplace policy, contact the consumer to verify all demographics, and then contact the ER&R Support Center for further research.
Prior_Year_BAR_Failure	This category appears when the issuer's record is related to a prior year enrollment that is part of the CMS BAR Failure Report. Subsequently, the member did not BAR in 2018. The issuer is reporting a current year enrollment within the RCNO file; however, the FFM indicates there is only valid enrollment for a prior year. NOTE: These records will be a small subset of the Prior_Year category.	The issuer needs to perform consumer outreach to ask the member to contact the Marketplace to complete an enrollment. The Marketplace account will be tagged with an SEP. The issuer does not need to perform consumer outreach if the coverage is already terminated.
Persistent_UIE	This category is applied to current year "I" records that were reported as Prior_Year "I" records within the previous coverage year. This category is unique to the current coverage year.	The issuer needs to perform consumer outreach to ask the member to contact the Marketplace to complete an enrollment. The Marketplace account will be tagged with an SEP.

UIR Issuer Action Required – Enrollment Dispute to Be Submitted

UIR Report Category	Definition	Tip For Resolution
Enrollment_Blocker	This category appears when the issuer record has a corresponding HICS case in which an Enrollment Blocker was identified.	The issuer needs to submit an Enrollment Dispute to have the financial information updated, if applicable. Enrollment Blocker UIEs should continue to be reported monthly on RCNI and are allowed to persist.
Reinstatement_Needed	This category appears when the issuer record can be associated to a cancelled FFM policy. Since the cancelled policy is not on the RCNO, an inventory number is not provided on the issuer's report.	The issuer needs to review the latest Pre-Audit file and submit an Enrollment Dispute to reinstate the policy. Once the policy is reinstated, the Reconciliation process will be able to match the records and process accordingly.

UIR No Issuer Action Needed

UIR Report Category	Definition	Tip For Resolution
Ineligible_Newborns	This category appears when the issuer record is reporting a coverage period of 31 days or less for a newborn.	No issuer action is required; this UIE record will persist.
In_Process	This category appears when CMS Investigation is still in progress at the time of reporting.	No issuer action is required; CMS will continue to research the record and provide categorization details in a subsequent run if the UIR persists.
FFM_Timing_Issue	This category appears when a policy is created after the Pre-Audit snapshot but before the issuer submits RCNI.	No issuer action is required.
FFM_Updates_Processing	ER&R has submitted updates to the FFM. Please allow 1–2 monthly Reconciliation cycles for the FFM and payments (if applicable) to be updated accordingly.	No issuer action is required.

FFM_Timing_Issue Records

Issuers may question some FFM_Timing_Issue records on their UIR Report.

- In some scenarios, where a matching FFM record is not identified in RCNO but is identified in additional data sources, the automated logic will assign the FFM_Timing_Issue category on the first report where the UIR appears.
- If the automated logic identifies that a suspected timing issue UIR has persisted for multiple reports, the automated system determines that it is not a timing issue, and the record is categorized as In_Process and assigned to an analyst for manual review.
- The analyst will manually apply the correct category after additional research.

Issuers who believe that the FFM_Timing_Issue category on the UIR Report is wrong should review subsequent reports for more specific guidance on these UIRs. The UIR will be categorized as either In_Process or a specific category on future reports if the UIR persists.

Reinstatement_Needed Category

To resolve the Reinstatement_Needed category scenario, the issuer needs to submit an Enrollment Dispute to reinstate the policy. Once the policy is reinstated, the Reconciliation process will be able to match the records and process accordingly.

Resolution guidance:

- Retrieve the cancelled policy number found in the Pre-Audit file.
 - Issuers should not use the policy ID found in the RCNO for the “I” record because that policy ID is from a prior year, and ER&R will not be able to reinstate the policy.
 - Issuers should ensure the policy represents the correct enrollment group that needs reinstatement.
- Submit a Reinstatement End Date 12/31 dispute to have the entire policy reinstated to 12/31 for the current coverage year.
 - If 12/31 is not the intended end date, issuers can update the end date through the monthly Reconciliation process once the “I” record is matched in the RCNO.

FFM_Updates_Processing Category

- ER&R introduced a new UIR category, FFM_Updates_Processing, on 02/21/2020.
- The FFM_Updates_Processing category indicates that an Enrollment Blocker UIR is associated to an Enrollment Blocker HICS Direct Dispute.
- The resolution guidance is as follows:
 - Issuers are not required to take any action on FFM_Updates_Processing UIRs.
 - ER&R will submit updates related to the HICS Direct Dispute to the FFM.
 - The updated information and associated payment adjustments will be processed within 1–2 monthly Reconciliation cycles.

UIR Report Format

The UIR Report is an Excel file consisting of the following fields:

- Column A contains the UIR Case ID, a unique ER&R-assigned identifier that issuers can use to identify the record in communications with ER&R.
 - Columns B through D and F through U provide information from the RCNO “I” record.
 - Columns E and V through AB contain the UIR Report-specific data. The UIR_Case_ID, Coverage_Year, and Enrollment_Category fields should always contain a value; however, other UIR Report-specific fields may be inapplicable and intentionally left blank.
- NOTE:** The coverage year (column E) value is not determined using RCNO data.
- Columns W, AA, and AB contain the Matched FFM Internal Inventory Record Number, Matched Exchange-Assigned Subscriber ID, and Matched Exchange-Assigned Member ID, respectively.
 - These columns are only populated for UIRs falling into any of the “matched” categories.
 - The following images depict the UIR Report headers.
 - The columns with blue headers provide the information applied by ER&R.
 - The columns with green headers replicate RCNO data.

UIR_CASE_ID	FIL_TP_ID	HIOS_ID	QHPIID_LKP_KEY	COVERAGE_YEAR	FTI_INTERNAL_BATCH_ID	FFM_INTERNAL_INVENTORY_NUMBER	ISSUER_PRSN_1ST_NAME	ISSUER_PRSN_LAST_NAME	ISSUER_PRSN_BIRTH_DT	ISSUER_BENE_SSN_KEY	ISSUER_BENE_SBS_EXCHG_ASG_ID	ISSUER_BENE_EXCHG_ASG_NED_ID	ISS_PLAN_EXC_HG_ASG_PLCY_NUM
ISSUER_PLAN_I_SSR_ASG_PLCY_NUM	ISSUER_PLAN_PLCY_ID	ISSUER_PLAN_BNFT_STRT_DT	ISSUER_PLAN_BNFT_END_DT	ISSUER_PLCY_APTC_AMT	ISSUER_PLCY_TOT_PRM_AMT	ISSUER_PRM_PD_IND	ENROLLMENT_CATEGORY	MATCHED_FFM_INTERNAL_INVENTORY_RECORD	APPLICATION_ID	HICS_CASE_ID	NUMBER_OF_MONTHS_REP_OR TED	MATCHED_FFM_BENE_SBS_EXCHG_ASG_ID	MATCHED_FFM_BENE_EXCHG_ASG_NED_ID

UIR Report Fields

The table identifies the information provided from the RCNO "I" record.

UIR Report Field Names	RCNO Field	RCNO Data Element*
FIL_TP_ID	2	TPID
HIOS_ID	5	HIOS ID
QHPID_LKP_KEY	6	QHP ID Lookup Key
FTI_INTERNAL_BATCH_ID	143	FTI Internal Batch ID
FFM INTERNAL INVENTORY NUMBER	141	FFM Internal Inventory Record Number
ISSUER_PRSN_1ST_NAME	9	Issuer Member First Name
ISSUER_PRSN_LAST_NAME	15	Issuer Member Last Name
ISSUER_PRSN_BIRTH_DT	18	Issuer DOB
ISSUER_BENE_SSN_KEY	24	Issuer SSN
ISSUER_BENE_SBS_EXCHG_ASG_ID	33	Issuer Exchange-Assigned Subscriber ID
ISSUER_BENE_EXCHG_ASGNED_ID	36	Issuer Exchange-Assigned Member ID
ISS_PLAN_EXCHG_ASG_PLCY_NUM	45	Issuer Exchange-Assigned Policy Number
ISSUER_PLAN_ISSR_ASG_PLCY_NUM	48	Issuer Issuer-Assigned Policy ID
ISSUER_PLAN_PLCY_ID	93	Issuer QHP ID
ISSUER_PLAN_BNFT_STRT_DT	96	Issuer Benefit Start Date
ISSUER_PLAN_BNFT_END_DT	99	Issuer Benefit End Date
ISSUER_PLCY_APTC_AMT	102	Issuer Applied APTC Amount
ISSUER_PLCY_TOT_PRM_AMT	120	Issuer Total Premium Amount
ISSUER_PRM_PD_IND	138	Issuer Initial Premium Paid Status

*According to the FFM Outbound Enrollment Reconciliation File Specification version 5.12

UIR Report Fields (Cont.)

The following fields are populated with the UIR Report-specific data:

- **UIR_Case_ID** – Reports the unique identifier assigned to the case by ER&R
- **Coverage_Year** – Reports the coverage year value assigned to the record by ER&R
- **Enrollment_Category** – Reports the enrollment category associated to the UIR
- **Matched_FFM_Internal_Inventory_Record** – When applicable, reports the FFM Internal Inventory Record Number for the FFM record identified as matching the same consumer
- **Application_ID** – When applicable, reports the application ID associated to the consumer
- **HICS_Case_ID** – When applicable, reports the HICS Case ID associated to the UIR
- **Number_Of_Months_Reported** – Reports the number of runs in which the UIR has been reported
- **Matched_FFM_BENE_SBS_EXCHG_ASG_ID** – When applicable, reports the Exchange-Assigned Subscriber ID for the FFM record identified as matching the same consumer
- **Matched_FFM_BENE_EXCHG_ASGNED_ID** – When applicable, reports the Exchange-Assigned Member ID for the FFM record identified as matching the same consumer

UIR Report Delivery and Notification

Issuers receive UIR Reports via EFT using the file naming convention TPID.[Function Code].DDDDDDDD.TTTTTTTTTT.P.OUT.

NOTE: Depending on each issuer's specific EFT setup, filenames may not include the .OUT file extension.

- The function code format is “UIR” followed by a one-digit identifier indicating the year with which the report is associated.
 - The function code for 2019 UIR Reports is **UIR9**.
 - The function code for 2020 UIR Reports is **UIR0**.
 - ER&R will use this format to create a new function code for each future year, ensuring that issuers can easily differentiate between reports during the periods when Reconciliation is occurring simultaneously for two (2) coverage years.

ER&R also sends a notification email that contains the filename to the point of contact for each issuer.

- To update point of contact information, please contact the ER&R Support Center:
 - **1 (855) 591-7113**
 - ERRSupportCenter@Cognosante.com

ER&R delivers UIR Reports on the third Friday after RCNO delivery.

- The UIR Reports are in the Excel format.
- The reports are only sent to issuers with UIRs. Some issuers may not receive a file.
- RCNO delivery dates are available on the Data Reconciliation Calendar on CMS zONE at <https://zone.cms.gov/document/pre-audit-and-recon-calendar-and-file-specification>.

UIEs

UIEs are placed into the categories identified in the table located on slide 6.

- Issuers were directed to perform consumer outreach to active enrollees for 2018 UIE records in the Prior_Year and Prior_Year_BAR_Failure categories.
- Issuers were directed to perform consumer outreach to active enrollees for UIE records in the Prior_Year category for 2019.
- For certain 2019 Prior_Year UIE records that cannot be resolved through standard FFM Reconciliation processes, CMS intends to make manual payments through July 31, 2019, and generate manual Form 1095-As.

Issuer Outreach to UIEs

Issuer outreach to UIEs should contain the following key points:

- There is an issue with your current Marketplace plan enrollment and you qualify for a Special Enrollment Period (SEP) to fix your Marketplace record.
- Action is needed! You need to call the Marketplace at **1 (800) 318-2596** and (re)select a plan:
 - Make sure everyone in your household is included on the application.
 - Add or update any information that has changed—like your income, address, or people in your household.
 - After you compare your coverage options, make sure each person on your application who needs coverage and is eligible is enrolled in a plan for the current coverage year.

SEP-Eligible UIE Cases Process

The issuer process for resolving a UIE case that is eligible for an SEP is as follows:

1. The issuer advises the consumer to call the Marketplace and request the SEP.
2. The consumer contacts the Marketplace Call Center and requests the SEP.
3. The Marketplace Call Center approves the SEP and establishes a prospective enrollment, sending an I834 to the issuer.
4. The Marketplace Call Center creates a Category 2 HICS case instructing the issuer to retroactively process the new enrollment start date.

NOTE: Issuers can identify these cases by looking for the narrative **“SEP – consumer is eligible for a retroactive start date.”**

5. After receiving the I834, the issuer must update their internal records as needed and then submit the corrected start date from the HICS case through Recon.
6. The issuer should notate the Recon updates on the HICS case and close the case.
7. The issuer should monitor RCNO data to confirm that the changes processed correctly. Once the update has been confirmed, the issuer may note the confirmation on the closed HICS case.

If issuers have any questions about this process, contact the ER&R Support Center at ERRSupportCenter@Cognosante.com.

2019 UIE Guidance and Background

2019 UIE Payment Policy Guidance:

- On April 19, 2019, CMS posted an issuer letter to CMS zONE detailing how CMS will handle payment for the 2019 Prior_Year UIEs. The letter was also distributed to issuers by the FMCC issuer outreach team. Access the letter at https://zone.cms.gov/system/files/documents/2019_uie_issuer_letter_.pdf.
NOTE: Some letters were sent to issuers regarding SADPs. Please disregard those letters, as this only applies to QHPs.
- Issuers should not reenroll UIEs for 2020, as Advance Premium Tax Credit (APTC) payments will not be made for these enrollments.

Previously Released Guidance:

- In presentations on issuer calls during October 2016, available on CMS zONE, CMS announced that it would make Marketplace financial assistance payments and generate Form 1095-As for certain 2016 UIEs. This guidance further instructed issuers **not** to automatically reenroll UIEs into 2017 QHPs.
- As outlined in *Unaffiliated Issuer Enrollments (UIEs)*, dated December 9, 2016, issuers were required to terminate UIE coverage effective December 31, 2016.
- On August 6, 2018, CMS posted an issuer letter to CMS zONE that detailed how CMS would handle payment for 2018 UIEs. Access the letter at https://zone.cms.gov/system/files/documents/uie_issuerletter_august_2018.pdf.

2019 UIE Payment Policy Guidance

At the end of the 2019 coverage year, CMS will make manual payments for any remaining 2019 Prior_Year UIEs for coverage through July 31, 2019. Form 1095-As will also be generated for these policies reflecting coverage through July 31, 2019.

- Issuers must perform consumer outreach (see [Issuer Outreach to UIEs](#)) and notify the consumer of the following by June 1, 2019:
 - The consumer is entitled to a 60-day Marketplace Error SEP.
 - If the consumer does not utilize the available SEP, coverage ends on July 31, 2019.
 - The consumer has the option to obtain coverage through a non-Marketplace plan, if applicable.
- If the consumer does not complete a 2019 enrollment to resolve the UIE, the issuer is expected to terminate coverage as of July 31, 2019, and submit the UIE record on the RCNI with an end date of July 31, 2019.
- If the consumer subsequently completes a 2019 enrollment, the issuer should update the subsequent 2019 RCNI submissions with the applicable information from the matching FFM record.
- The issuer should not reenroll the consumer for 2020 coverage unless the consumer completes a 2019 enrollment, as APTC payments will not be made.

Manual Payment Process for 2019 UIEs – Records Ineligible for Payment

CMS will exclude the UIE records in the following categories from processing for payment and IRS Form 1095-A generation:

- **Ineligible_Newborns:** Newborn UIE record that is presumed to reflect an issuer operational workaround related to state laws requiring 31 days of free coverage for a newborn under the subscriber's policy
- **FFM_Timing_Issue:** Enrollment record created after the 15th of the current month
- **FFM_Enrollment_Blocker:** Enrollment record that has a corresponding HICS case in which an Enrollment Blocker was identified

NOTE: CMS does issue manual Form 1095-As for FFM_Enrollment_Blocker UIEs, as limitations in Marketplace systems cause these UIEs to persist; however, these records are not eligible for manual payment.

- **Persistent_UIE:** Current year “I” record that was reported as a Prior_Year “I” record within the previous coverage year; unique to the current coverage year
- **No_Records_Found:** “I” record cannot be associated to an application or an FFM enrollment record
- **Dental_Prior_Year:** “I” record with no valid SADP enrollment for the current year; the most recent SADP enrollment within the FFM was for a prior year

CMS will also exclude MIEs and In_Process UIRs from payment processing.

Q&A



Contact the ER&R Support Center

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