Financial Management Series III: Transition Guidance – Dispute Section

December 18, 2015

Financial Management Series III

HTTPS://WWW.REGTAP.INFO

ERR, EFT and Proposed Dispute Form

Dispute Form

- The enrollment/payment dispute form is available on REGTAP and CMS Zone.
- This form should be used anytime an issuer has a dispute that arises from the PPR/820.
  - Issuers will not need to report whether the dispute relates to enrollment or payment
  - CMS will determine if a dispute arises from an enrollment or payment issue
- The previous dispute form can still be used
  - If issuers identify disputes in reviewing the RCNO that cannot be corrected through automated recon (reinstatement, retroactivity, etc), or that have not updated when previously reported via recon
  - To report disputes that will affect payment before the issuer has received a PPR/820 for the affected month
- Note: The payment dispute tab of the previous form should not be used. We will release a new version without the payment tab.

Dispute Form – Revision

- In response to Issuer feedback, the dispute form has been revised:
  - Supply values from PPR/820 and your own system.
  - No dispute type categorization required.
  - Enhanced to provide for more traceability.
  - Instructions tab provides detailed guidance for completion.
- Form may be submitted in either the Excel format or in a PSV (pipe-separated values) format.
- Dispute form can only be submitted via EFT.

Dispute Form

Identifying Information

Issuer (HIOS) ID	Payee ID
Exchange Assigned Subscriber ID	Issuer Subscriber ID
Exchange Assigned Policy ID	Issuer Policy ID
Payment Cycle Month	PPR Set Control #/820 Trace EFT #
Issuer Assigned File Control #	Recurring Flag/CMS Dispute Control #
Issuer Assigned Dispute Control #	HICS Case #
Submission Time/Date	Contact Information

Dispute Form (Continued)

Discrepancy Information—Issuer and FFM versions of truth

Coverage Period Start Date	Coverage Period End Date (within same month as start)
APTC Amount	CSR Amount
User Fee Amount	Policy Total Premium Amount

 * FFM and Issuer values will be supplied on the form to illustrate the discrepancy on a conditional basis.

- If the FFM pays for a subscriber during a month in which the issuer does not have that subscriber enrolled, issuer values will be blank or zero.
- If the issuer expected payment but did not receive it for a subscriber in a specific month, the FFM data will be blank or zero.
- If the issuer expected payment but differed on the amounts or the coverage dates within a month (for partial months) both FFM and issuer data will be populated.

Discrepancy Dispute Form

Display proposed Discrepancy Dispute Form here

EFT Readiness for Dispute Submissions

- Issuers must register as an EDI Trading Partner with CMS prior to submitting dispute forms to the Enrollment Resolution and Reconciliation (ERR) contractor.

Centers for Medicare and Medicaid Services
Marketplace EDI Registration Form

Partner Type*		Confirmation Number		Form Type*	☐ New ☐ Change ☐ Remove

1) General Information. Do Not Write in Shaded Areas of this Form. Refer to Instructions for Form Completion. This Section Has to be Filled for All Scenarios Including New Registration, Change Registration and Removing a Partner.

Legal Business Name of Partner Submitting this Form*	Partner Name*	Tax Payer Identification Number*

Street Address Line 1*	Street Address Line 2	City*	State*	Zip*

E-Mail Address*	Phone Number*	Extension

- Enterprise File Transfer (EFT) solution must be used for dispute form submissions.
- Issuer must establish EFT readiness with CMS.
- Issuers should test the EFT process (if they haven't already done so) by sending EFT a raw text file stating "TEST FILE REQUEST REPLY". CMS will reply to received test files with "TEST FILE REQUEST REPLY RECEIVED".

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Dispute Form Submission via EFT

Assuming the endpoint has already been set up through CMS

- Issuers must submit dispute forms to the ERR contractor via EFT
- Once the endpoint set up through CMS, please use the following file naming convention:
  - TP.ERRS.Ddddddd.Tttttttttt.P.IN
- Syntax
  - TP = Issuer's function code (TPID), also known as the Source ID
  - ERRS = Cognosante Function Code
  - D = Date Stamp
  - T = Time Stamp
  - P = Production Environment
  - IN = Appropriate File Name Extension
- Example
  - 12345.ERRS.D160215.T162055453.P.IN

Next Steps

- Future discussions will provide more details on the

  o Dispute Process

  o Disposition/Response File ERR returns

  o Timelines for Payment Adjustment Updates

- Note on RA/RI program level disputes
  These will still be processed using the current process; issuers should contact
  raripaymentoperations@cms.hhs.gov for any guidance.

Additional Information for Discrepancy Reporting

- Additional Information on Discrepancy Reporting can be found in REGTAP at the following link: https://www.regtap.info/uploads/library/FT_FMSeriesIII_slides_111615_5CR_112015.pdf

Questions?

To submit questions by phone:

- *dial '14' on your phone's keypad*
  - *dial '13' to withdraw your question*

To submit questions by webinar:

- *type your question in the text box under the 'Q&A' tab*

Acronyms

Acronym	Definition
DSH	Data Services Hub
EDI	Electronic Data Interchange
EPS	Enrollment and Payment System
FFM	Federally-facilitated Marketplace
FMCC	Financial Management Coordination Center
HIOS	Health Insurance Oversight System
HIX	Health Insurance Exchange
PBP	Policy-based Payments
PPR	Preliminary Payment Report
SBM	State-based Marketplace
SHOP	Small Business Health Options Program

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Resources

Resource	Resource Link
Centers for Medicare & Medicaid Services (CMS)	http://www.cms.gov/
U.S. Department of Health & Human Services	http://www.hhs.gov/
The Center for Consumer Information & Insurance Oversight (CCIIO) web page	http://www.cms.gov/cciio
Consumer website on Health Reform	http://www.healthcare.gov/
ASC X12 Store	http://store.x12.org/store/health-insurance-exchanges
Registration for Technical Assistance Portal (REGTAP) - presentations, FAQs	https://www.REGTAP.info

Document Location

Additional Materials for FM Series III are available in the REGTAP Library at https://www.REGTAP.info
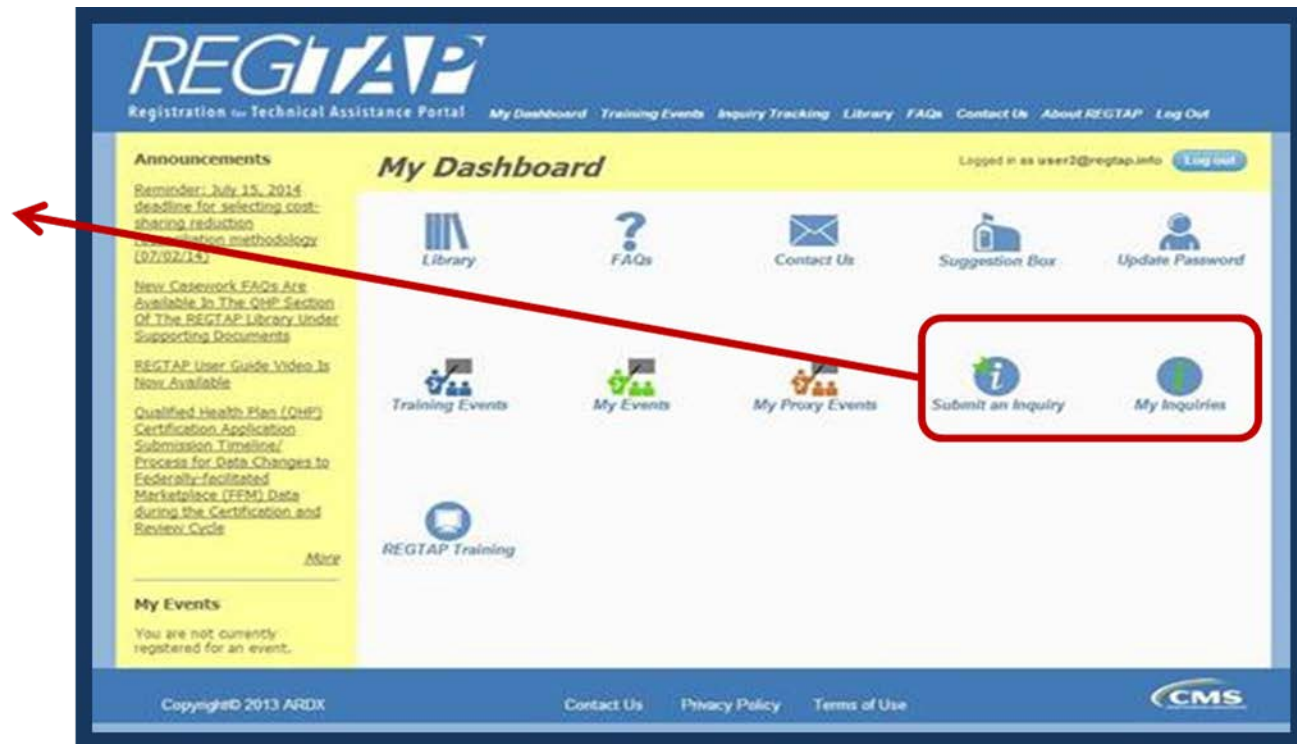
Under Program Area, select "Payments – Remittance Message (X12 HIX 820)"

Inquiry Tracking and Management System (ITMS)

Stakeholders can submit inquiries to ITMS at
https://www.REGTAP.info

Select "Submit an Inquiry" from My Dashboard.

FAQ Database on REGTAP

The FAQ Database allows users to search FAQs by FAQ ID, Keyword/Phrase, Program Area, Primary and Secondary Categories, and Publish Date.

FAQ Database is available at
https://www.REGTAP.info/

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Closing Remarks