

Nevada Transition to Policy-Based Payments

April 9th 2019

Agenda

- SBE Policy-Based Payment Introduction
- SBE PBP Enrollment Data Collection Process Overview
- Workbooks Overview
- Workbook Population and Submission
- Resources
- Q&A

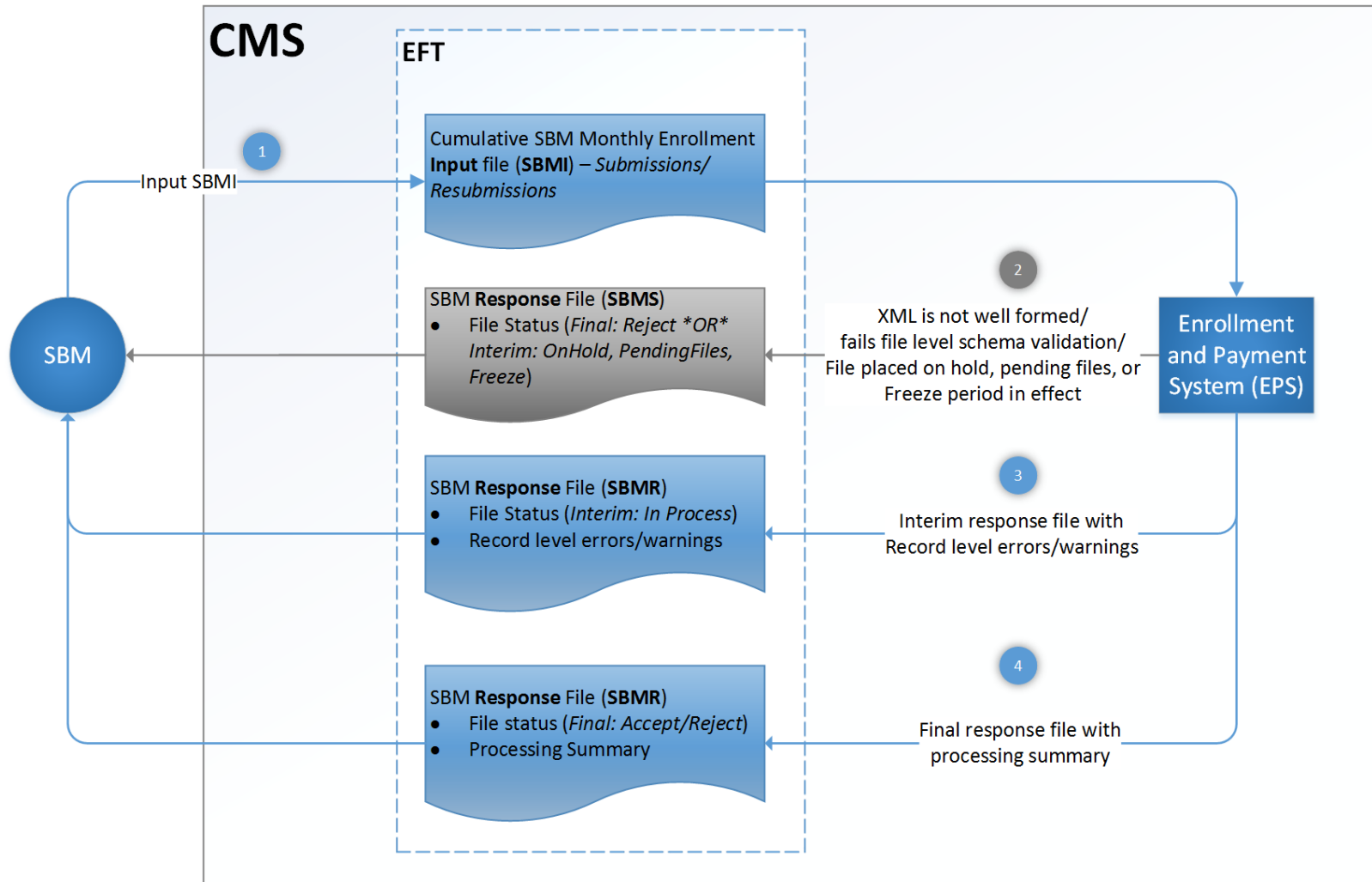
APTC Payments in an SBE

- The Policy-Based Payment (PBP) system allows CMS to make payments based on policy level enrollment data in the SBE's enrollment system
 - PBP launched for the FFE system in January 2016, it launched for SBEs in January 2018.
 - CMS makes payments to issuers based on effectuated enrollments in the FFE and will do the same for SBE effectuated enrollments
 - Makes adjustments to past months' payments if there are any retroactive changes to the enrollment data based on disputes or late reporting
- CMS previously used a manual payment process that relies on issuer or SBE attestation to make monthly APTC payments. Now the manual payment process will only be used to validate PBP payments during the first few months of start-up operations and make adjustments, as necessary.
- SBE issuers will not be billed for FFE user fees.

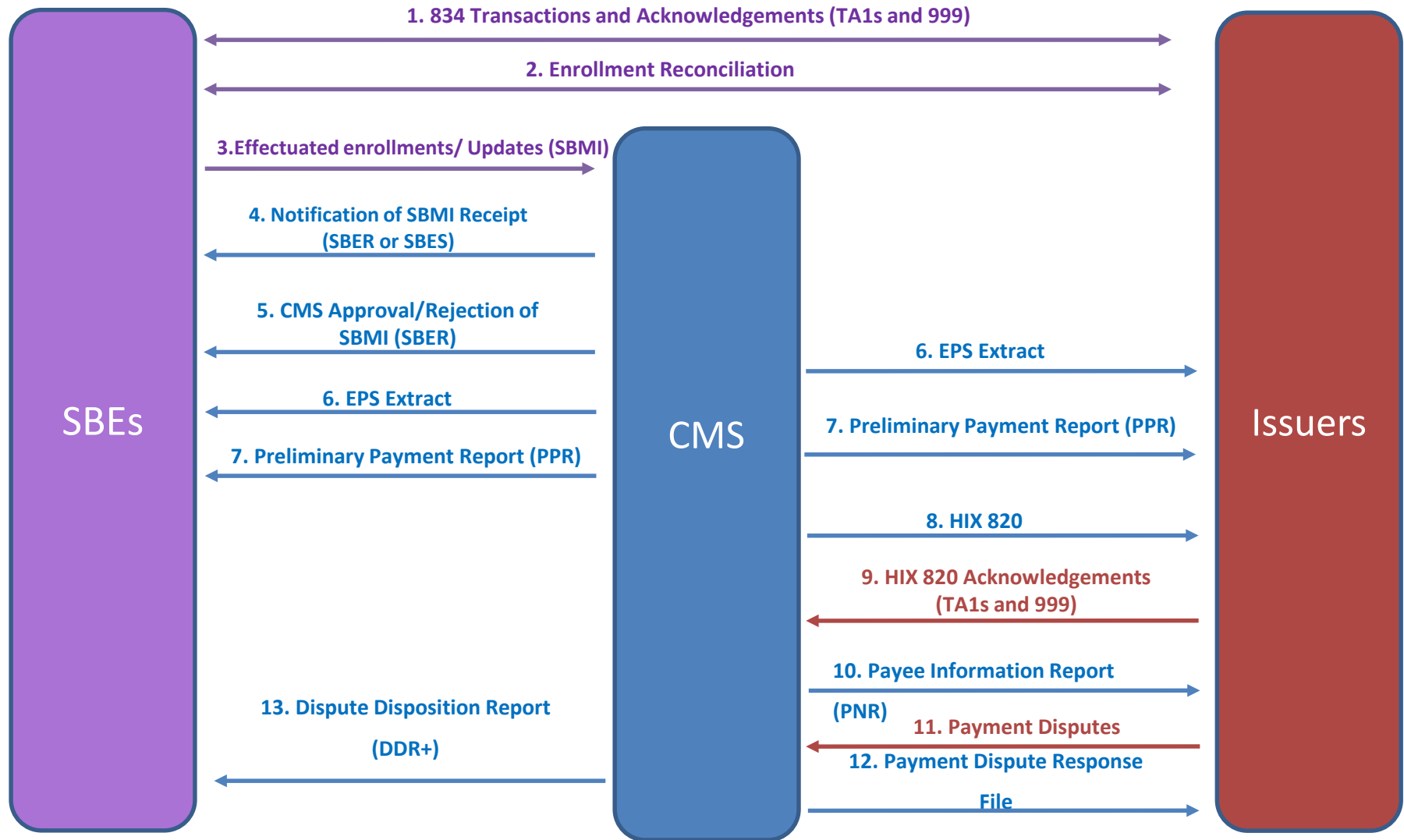
SBE PBP Enrollment Data Collection Process Overview

- SBEs reconcile and validate enrollment data with SBE issuers to ensure enrollment data is accurate for policy-based payment.
- SBEs transmit policy-level enrollment data to CMS via a State-based Marketplace Inbound (SBMI) XML file on a monthly basis.
- CMS receives and processes SBE enrollment data at the policy level each month in a cycle that feeds into its monthly payment cycle.
- As in the FFE, payments are made to SBE issuers based on effectuated enrollments.
- A payment dispute reporting process is in place to allow issuers to communicate payment disagreements to CMS.

SBE Enrollment Data Transmission Process



File Transfers Between CMS, SBE, and Issuers



Phases of SBE PBP Transition (1)

- **Workbook Validation Oct - Dec 2019**
 - Issuers will send 2019 manual workbooks to CMS to validate accuracy of workbooks against 2019 FFE PBP data.
 - Issuers will continue to be paid based on FFE PBP for 2019 coverage, with any retroactive 2019 changes continuing to be processed through FFE PBP into 2020 and future years.
- **Production Readiness (ProdR) Data Validation - January 2020 Payment Cycle**
 - The SBE sends production data from their 2020 enrollment system to the CMS ProdR region beginning as soon as possible in during Open Enrollment for the 2020 coverage year (likely in late 2019).
 - Production data sent to ProdR will only be used for payment data validation and will **not** be used to make actual PBP payments to issuers.
 - CMS makes 2020 payment to issuers using Manual Payment Workbooks during this Prod R validation phase.
 - Sending data to ProdR will help CMS determine if the SBE can send and CMS can ingest files as well as verify the content of the files.
 - CMS compares the SBMI data sent to ProdR with manual workbooks to assess the data.

Phases of SBE PBP Transition (2)

- Initial Transition to PBP: Production (Prod) data validation, with manual adjustment to the manual payment workbooks - **Winter/Spring 2020**
 - Once CMS has validated the SBE's ProdR data, CMS and the SBE will agree on a cycle in which the SBE will begin submitting the SBMI to Prod
 - CMS will compare SBMI data in the Prod region to manual payment workbooks to determine PBP data readiness.
 - During the validation period, CMS runs the policy-based payment system and then manually adjusts total payments to the workbook amounts.
 - Issuers will see policy-level detail on their Preliminary Payment Reports (PPRs) and HIX820s, along with a temporary manual adjustment bringing total payment in line with the amount submitted on the workbook
 - CMS and the SBE work together to determine if the PBP and manual workbook amounts are in sufficient alignment to complete transition.
- Full Transition to PBP – **Spring 2020**
 - CMS reverses the temporary manual payment adjustments to the workbook amounts from past cycles so that the SBE issuer is paid entirely based on PBP.
 - SBE issuers continue to send in manual payment workbooks until CMS and the SBE agree that the workbook validation of PBP payment data is no longer needed.

PBP Disputes Overview

- Each month SBE issuers compare their own detailed enrollment and payment data to the data sent by CMS in the PPR and HIX-820. If an issuer identifies discrepant payment amounts, the issuer can dispute those payments through the submission of the SBE Payment Dispute Form to CMS.
- Payment Disputes are processed using established business rules and Payment Dispute response files are returned to issuers to provide tracking information and a disposition, which describes the status, for each dispute.
- CMS also delivers a Monthly SBE Dispute Disposition Report+ to the states aggregating all the response files sent to each issuer in their state.
- This report can help SBEs collaborate with their issuers to analyze and resolve enrollment discrepancies.
- What does an issuer see?
 - Issuers submit dispute files with a single header record and one to many detail records.
 - CMS processes these disputes and append fields to the end of each detail record.
 - This entire file (the issuers dispute file, appended with the response fields) is returned to issuers as the response file.

Enrollment & Payment Data Workbook Process

Populating the Workbook

State

- Two (2) letter state code in caps.

16-Digit QHP ID

- 16-digit unique QHP identifier. Includes 14-digit standard component QHP ID, plus the 2-digit variant ID (known as the HIOS Plan ID).
- For each QHP offered, document the 16-digit unique identifier without the use of spaces or non-numeric characters.
- Each 16 -digit QHP identifier should only be used once throughout the entire table.

State

9 Digit Issuer TIN

5 Digit HIOS Issuer ID

16 Digit QHP ID

9-Digit Issuer TIN

- issuer's 9-digit taxpayer identification number assigned by the IRS.

5-Digit HIOS Issuer ID

- 5-digit issuer identifier assigned by HIOS.

Populating the Workbook (continued)

Total Premium Amount for Effectuated Enrollments by QHP ID

- The total premium amount for the health coverage by 16-digit QHP ID for all effectuated enrollments within that plan.
- An effectuated enrollment is defined as any enrollment in which the total individual responsibility amount has been paid in full by the enrollment group.
- Sum the total premium amounts for all effectuated enrollment groups within each QHP and enter this amount for each plan ID listed.

Enrollment Month:	March-19
Total Premium amount by QHP ID for effectuated enrollments	Total APTC amount by QHP ID for effectuated enrollments

Total APTC Amount for Effectuated Enrollments by QHP ID

- APTC applied toward the total premium amount for effectuated enrollments within a 16-digit QHP ID.
- Sum the actual APTC amount that is expected for all effectuated enrollments within each QHP, and enter this amount for each plan ID listed

Populating the Workbook (continued)

Total # of Effectuated Enrollment Groups by QHP ID

- Total number of effectuated enrollment groups associated with a QHP ID.

Total # of effectuated enrollment groups by QHP ID

Total # of effectuated enrollment groups receiving APTC by QHP ID

Total # of effectuated enrollment groups receiving CSR by QHP ID

Total # of Effectuated Enrollment Groups Receiving APTC by QHP ID

- Total number effectuated enrollment groups associated with a QHP ID that will receive APTC payments.

Total # of Effectuated Enrollment Groups Receiving CSR by QHP ID

- Total number effectuated enrollment groups associated with a QHP ID that will receive CSR payments.

Populating the Workbook (continued)

Total # of Effectuated Members by QHP ID

- Total number of members by QHP ID within effectuated enrollment groups.

Total # of effectuated members by QHP ID

Total # of effectuated members receiving APTC by QHP ID

Total # of effectuated members receiving CSR by QHP ID

Total # of Effectuated Members Receiving APTC by QHP ID

- Total number of members by QHP ID within effectuated enrollment groups who receive APTC.

Total # of Effectuated Members Receiving CSR by QHP ID

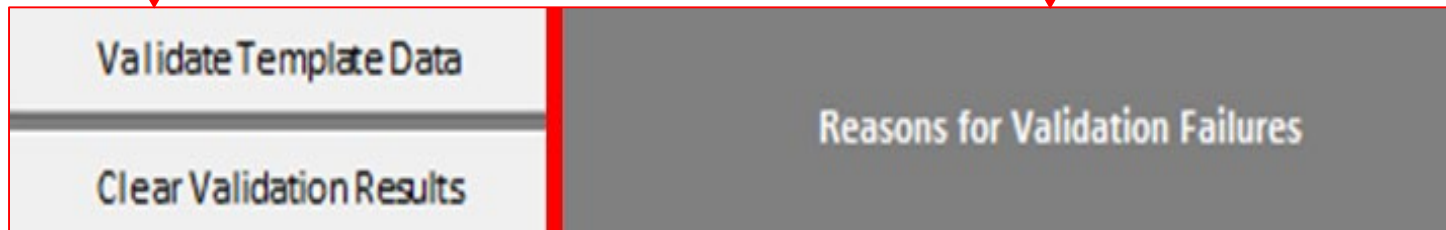
- Total number of members by QHP ID within effectuated enrollment groups who receive CSR.

Workbook Validation

CMS has included a validation tool that submitters must run prior to submitting data. The validations are EFT notifications that are sent out via EFT once the workbook has been processed.

After populating the workbook, the submitter will click on the “Validate Template Data” button.

The reasons for any validation failures will display in column P. submitters must correct errors prior to submitting to CMS.



Workbook Validation

Validation Errors that may generate a failure include:

- Duplicate plan IDs
- Higher APTC than premium
- Higher group enrollments than member counts
- Mismatched issuer IDs to QHP IDs
- Invalid Plan IDs

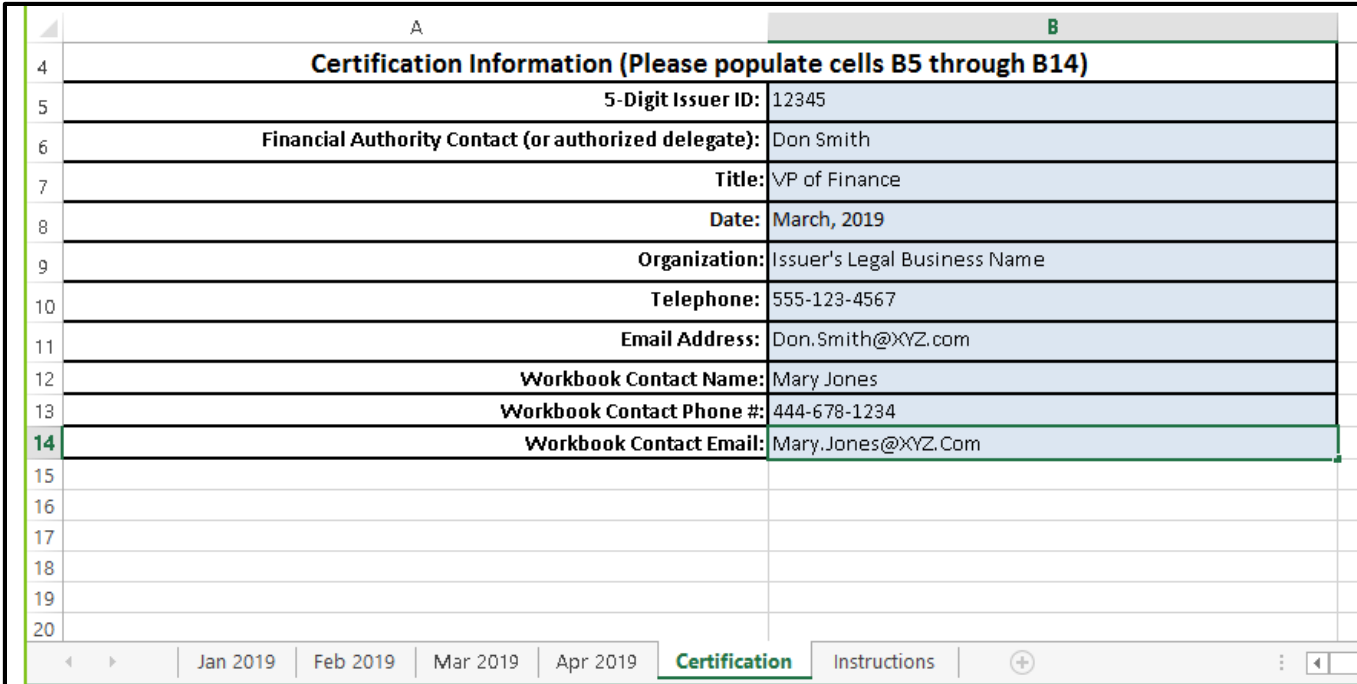
*NOTE: If an issuer fails validations in 2020 CMS will work with the SBE and the issuer to resubmit a corrected workbook.

Workbook Validation

- When all the tabs are green and you are ready to submit your workbook, you will receive a pop-up box providing the specific file naming convention for your file. You are required to first zip your file.
- Create a zip file that includes the workbook.
- Name the zip file with the naming convention provided in the pop up box.
- **Note:** Copy the zip file name by right-clicking on the name and clicking 'Copy' from the pop-up menu.
- Submit your workbook.

Completing Data Certification

- Issuers must populate all fields of the 'Certification' tab of the Workbook.
- Failure to complete all fields will result in a Cursory fail of the workbook and a resubmission will be required.
 - The Date field has been pre-set with the current month/year. Issuers must not alter the date.
- Issuers should not submit blank workbooks.



The screenshot shows a spreadsheet with columns A and B. Row 4 contains the header "Certification Information (Please populate cells B5 through B14)". Rows 5 through 14 contain the following fields and values:

Row	Field	Value
5	5-Digit Issuer ID:	12345
6	Financial Authority Contact (or authorized delegate):	Don Smith
7	Title:	VP of Finance
8	Date:	March, 2019
9	Organization:	Issuer's Legal Business Name
10	Telephone:	555-123-4567
11	Email Address:	Don.Smith@XYZ.com
12	Workbook Contact Name:	Mary Jones
13	Workbook Contact Phone #:	444-678-1234
14	Workbook Contact Email:	Mary.Jones@XYZ.Com

The spreadsheet also shows a navigation bar at the bottom with tabs for "Jan 2019", "Feb 2019", "Mar 2019", "Apr 2019", "Certification", and "Instructions". The "Certification" tab is currently selected.

Workbook Notification Files

Once issuers submit their workbooks, they will receive a response from CMS. In addition to the acknowledgement file, you will receive 1 of the 3 notifications within 24 hours of CMS processing your workbook:

1. Acceptance - your workbook was processed successfully.
2. Cursory Review Failure – your workbook was not processed and requires updating and resubmission.
3. Validation File
 1. QHP “Failures” – A failed QHP will be removed from the workbook and not processed. The remainder of the workbook will process.
 2. QHP “Please Review” – All QHPs are processed, but requests the issuer to confirm the data is valid. Resubmission is not required unless determined by the issuer.

Workbook Process Dates

Key dates for Workbook Processing for Nevada PBP transition are listed below.

Key Activities	September	October	November	December	January	February	March
Test Connectivity using Workbook Function Codes	9/3 - 9/6						
2019 Workbook Submission and Processing	9/17-9/18	10/17-10/18	11/18- 11/19				
2020 Workbook Submission and Processing				~ 12/17-12/18	~1/17-1/20	~2/17-2/19	~3/17-3/19

- Workbooks will be provided to Issuers from CMS on the 12th of each submission month.
- Each workbook submission window closes on the 18th of each month at 12pm EST.
- There is a 2-day submission window. Specific submission dates will be outlined in the cover letter that is included in your workbook packet for each cycle.

EFT Routes for Workbook Submission

- Issuers and CMS will exchange workbook information via Electronic File Transfer. Function codes and file names for this transfer are listed below.

File Direction	Function Code	File Name
<p style="text-align: center;">Issuers to CMS</p>	<p style="text-align: center;">WBKI1A</p>	<p>File Name: <TradingPartnerID>.OPR.WBKI1A.DYYMMDD.THHMMSSSSS.P.IN</p> <p>Example: <TPID>.OPR.WBKI1A.D190415.T142524123.P.IN</p> <p>Please note: This is a XLSX file but should be renamed with a .IN file extension, where DYYMMDD is the current date and the THHMMSSSSS is the time as shown in the sample name above</p>
<p style="text-align: center;">CMS to Issuers</p>	<p style="text-align: center;">WBKO1A</p>	<p>File Name: <TradingPartnerID>.WBKO1A. DYYMMDD.THHMMSSSSS.P.OUT</p> <p>Example: <TPID>.WBKO1A.D190415.T142512123.P.OUT</p> <p>Please note-in order to save and open this file: This is a zip file and should be renamed from a file with a .OUT extension to a .ZIP extension in order to open it.</p> <p>Renaming & Saving Example: <TPID>.WBKO1A.D190415.T142512123.P.OUT.ZIP</p>

Resources & Contacts

Resources:

- The CMS zONE Wiki page for issuers has a wealth of information on the SBE PBP process. We encourage all issuers to make an account and get access to the zone page and associated documentation including technical reference guides, FAQs, ICDs and Archives of prior Issuer Meetings. <https://zone.cms.gov/wiki/SBE-issuer-information>

Access:

- Create an account on the CMS zONE Portal: <https://zone.cms.gov/>
- Once you are logged into zONE request access to the “Issuer Community – Private”
- After being granted access navigate to the SBE Issuer Information wiki: <https://zone.cms.gov/wiki/SBE-issuer-information>

Contacts:

- For workbook related inquiries: MarketplacePayments@cms.hhs.gov
- For PBP Transition related inquiries: SBMEnrollment@cms.hhs.gov

Questions

