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**Carrier Enrollment ICD Companion Guide**

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**Revision History**

|  |  |  |  |
| --- | --- | --- | --- |
| Version | Date | Modified By | Description |
| 1.0 | 04/04/13 | Brad Fredericks | Initial Draft. |
| 2.0 | 04/26/13 | Brad Fredericks | Removed 834Echo and replaced with 834 Confirmation. Added specification for Error message. Edits for clarity and accuracy. |
| 3.0 | 04/29/13 | PMO | Submit to SOV |
| 3.1 | 05/10/13 | Brad Fredericks | Added TA1 layout, relationship codes, newborn handling, updated error code list, and other clarifications in response to Carrier questions. |
| 4.0 | 05/17/13 | C Gasner | Submit revision to SOV |

# Introduction

The Vermont Health Benefit Exchange (VT HBE) is intended by the Affordable Care Act (ACA) to be a facilitator in the provision of healthcare coverage to its eligible citizens seeking it. It is intended to bring issuers and applicants together and streamline and operationally ease the task of applying for and enrolling in a healthcare plan.

This *Carrier Enrollment ICD Companion Guide* document serves as a supplement to the information provided in the *Carrier Enrollment Interface Control Document* (ICD).

This *Carrier Enrollment ICD Companion Guide* contains detailed information about how the VT HBE will use the ASC X12 Benefit Enrollment and Maintenance (834) transaction, based on the *005010X220 Implementation Guide* and its associated 005010X220A1 addenda.

In addition, this guide provides information for problem resolution, security, and interoperability testing.

# EDI Acknowledgements

## TA1 Interchange Acknowledgement

* The VT HBE expects to receive a TA1 interchange acknowledgment for every outbound 834 message sent.
* The VT HBE will send a TA1 acknowledgement for every inbound 834 message received when requested in the interchange control header.

The TA1 is the only synchronous message that the VT HBE expects to receive in response to a message.

Exhibit : TA1 Acknowledgement

|  |  |  |
| --- | --- | --- |
| Element Name | Element | Value |
| Interchange Control Number | I12 | The interchange control number sent in the originating message. |
| Interchange Date | I08 | The date of the interchange. |
| Interchange Time | I09 | The time of the interchange. |
| Interchange Acknowledgement Code | I17 | "A" |

## Functional Acknowledgement

The VT HBE expects to receive a 999 functional acknowledgment message only when an 834 message fails to pass the Issuer’s transaction business logic or if any HIPAA validation errors are detected.

# Subscribers/Dependents

Subscribers and dependents are sent as separate occurrences of Loop 2000 within the same message. The initial enrollment for the subscriber must be sent before sending the initial enrollment for any of the subscriber’s dependents.

# Character Set

As specified in the TR3, the basic character set includes uppercase letters, digits, space, and other special characters with the exception of those used for delimiters.

* All HIPAA segments and qualifiers must be submitted in UPPERCASE letters only.
* Suggested delimiters for the transaction are assigned as part of the trading partner set up. EDI Representative will discuss options with trading partners, if applicable.
* To avoid syntax errors, hyphens, parentheses and spaces are not recommended to be used in values for identifiers.

Examples: Tax ID 123654321 SSN 123456789 Phone 8001235010

# Small Business vs. Individual Transactions

Separate 834 messages will be created for Individual and Small Business enrollments to aid QHP issuers in processing enrollment transactions.

# Control Segments/Envelopes

Trading partners should follow the Interchange Control Structure (ICS) and Functional Group Structure (GS) guidelines for HIPAA that are located in the *HIPAA Implementation Guides*. The following sections address specific information needed by the VT HBE in order to process the ASC X12N/005010X220A1-834 Benefit Enrollment and Maintenance Transaction. This information should be used in conjunction with the ASC X12N/005010X220 Benefit Enrollment and Maintenance TR3.

Exhibit : Control Segments

| Element Name | Element | Value |
| --- | --- | --- |
| Authorization Information Qualifier | ISA01 | "00" |
| Security Information Qualifier | ISA03 | "00" |
| Interchange Sender ID Qualifier | ISA05 | "ZZ" |
| Interchange Sender ID | ISA06 | Sender's Federal Tax ID |
| Interchange ID Qualifier | ISA07 | "ZZ" |
| Interchange Receiver ID | ISA08 | "<RECEIVERS FEDERAL TAX ID>" |
| Interchange Control Number | ISA13 | A unique control number assigned by the VT HBE.  Note that manual problem resolution may require the re-transmission of an existing control number. |
| Interchange Acknowledgment  Requested | ISA14 | "1" |
| Interchange Usage Indicator | ISA15 | "P" Production Data  “T” Test Data |
| Functional Identifier Code | GS01 | "BE" |
| Application Sender’s Code | GS02 | Sender's Code (usually, but not necessarily, the Senders Federal Tax ID) |
| Application Receiver’s Code | GS03 | "<RECEIVER'S FEDERAL TAX ID>" |

# Detailed Business Scenarios for 834

The following sections present supplemental instructions for the content of 834 messages in the context of standard enrollment operations.

These business scenarios supported by the VT HBE are based on the *CMS FFE Standard Companion Guide*. Additional instruction has been provided in areas where the VT HBE usage of the 834 differs from the CMS approach.

The following table presents an overview of the transactions supported by the VT HBE, along with the party that will be permitted to initiate each message.

Exhibit : 834 Summary

|  |  |  |
| --- | --- | --- |
| Transaction Type | VT HBE – > QHP Issuer | VT HBE < – QHP Issuer |
| Initial Enrollment | X |  |
| Confirmation/Effectuation |  | X |
| 834 Confirmation | X | X |
| Error | X | X |
| Change | X |  |
| Cancelation | X | X |
| Termination | X | (Non-Payment only) |
| Reinstatement | X |  |
| Reconciliation | X | X |

## Initial Enrollment Supplemental Instructions - VT HBE to QHP Issuer

An Initial Enrollment transmission is created by the Exchange and sent to the QHP Issuer after an application has been determined eligible, a QHP has been selected, and payment has been verified.

Exhibit : Initial Enrollment Supplemental Instructions (VT HBE to QHP Issuer)

| Loop | Element | Element Name | Code | Instruction |
| --- | --- | --- | --- | --- |
| Header | BGN | Beginning Segment |  |  |
|  | BGN08 | Action Code | 2 | "Change" - Used to identify a transaction of additions. |
| Header | REF | Transaction Set Policy Number |  | There is never a unique ID number applicable to an entire transaction set. |
| Header | DTP | File Effective Date |  | Will transmit to indicate the date the information was gathered if that date is not the same as ISA09/GS04 date |
|  | DTP01 | Date Time Qualifier | 303 | "Maintenance Effective" - Date the enrollment information was collected by the exchange. |
| Header | QTY | Transaction Set Control Totals |  | Will transmit all 3 iterations of this segment for each for the qualifiers specified in QTY01. |
|  | QTY01 | Quantity Qualifier | TO  DT  ET | Total. Will transmit to indicate that the value  conveyed in QTY02 represents the total number of INS segments in this ST/SE set.  Dependent Total. Will transmit to indicate that the value conveyed in QTY02 represents the total number of INS segments in this ST/SE set with INS01 = "N"  Employee Total. Will transmit to indicate that  the value conveyed in QTY02 represents the total number of INS segments in this ST/SE set with INS01 = "Y" |
| 1000A | N1 | Sponsor Name |  |  |
|  | N103 | ID Code Qualifier | 24  FI | Small Business. (Small Business Market identifies the employer group.)  Individual Market. (Individual Market identifies the subscriber from the enrollment group, unless the subscriber is under-aged. If the subscriber is under-aged, identifies the responsible person.) |
| 1000B | N1 | Payer |  | Identifies the issuer of the QHP |
|  | N103 | Identification Code | FI  XV | Federal Taxpayer ID - will transmit until the HPID is required.  Will transmit after the HPID is required. (Unique National Health Plan Identifier) |
| 1000C | N1 | TPA/Broker Name |  | Broker information will not be transmitted. |
| 2000 | INS | Member Level  Detail | 2000 | INS |
|  | INS02 | Relationship Code |  | Will transmit member relationship codes when known. See the “Other Transaction Instructions” section for the list of relationship codes that may be transmitted during enrollment. |
|  | INS03 | Maintenance Type  Code | 021 | “Addition” |
|  | INS04 | Maintenance Reason Code | EC | "Member Benefit Selection" - Will transmit when the member has selected a QHP. |
|  | INS05 | Benefit Status Code | A | "Active" |
|  | INS08 | Employment Status Code | AC | "Active" |
| 2000 | REF | Subscriber Identifier |  |  |
|  | REF02 | Subscriber Identifier |  | The Exchange Assigned ID of the primary coverage person. |
| 2000 | REF | Member Supplemental Identifier |  |  |
|  | REF01 | Reference Identification Qualifier | 17 | "Client Reporting Category" - The Exchange Assigned Member ID will be conveyed in REF02. |
| 2100A | NM1 | Member Name |  |  |
|  | NM109 | Member Identifier |  | Will transmit the member's SSN when known.  When the SSN is not known, then the following value will be provided: “666666666” |
| 2100A | PER | Member Communications Numbers |  |  |
|  | PER03 | Communication Number Qualifier |  | Will transmit three communication contacts --- home phone, work phone, cell phone, or email address --- when the information is available. Communication contacts will be sent in the following order: 1st --- Primary Phone ("TE") 2nd --- Secondary Phone ("AP") 3rd --- Preferred Communication Method ("EM" for email or "BN" for a phone number for receiving text messages). If no preferred communication method is chosen, the third communication contact will not be sent. |
| 2100A | N3 | Member Residence Street Address |  |  |
| 2100A | N4 | Member City, State, ZIP Code |  |  |
|  | N404 | Country Code |  | Will transmit Country of Residence when available. |
|  | N406 | Location Identifier |  | County of Residence will not be transmitted. |
| 2100A | EC | Employment Class |  | This segment will never be transmitted. |
| 2100A | ICM | Member Income |  | This segment will never be transmitted. |
| 2100A | AMT | Member Policy Amounts |  | This segment will never be transmitted. |
| 2100A | HLH | Member Health Information |  | This segment will never be transmitted. |
| 2100A | LUI | Member Language |  | This segment will never be transmitted. |
| 2100B |  | Incorrect Member Name Loop |  | This loop does not apply to initial enrollments. |
| 2100D |  | Member Employer Loop |  | This loop will never be transmitted. |
| 2100E |  | Member School Loop |  | This loop will never be transmitted. |
| 2100F |  | Custodial Parent Loop |  | Because minors are subscribers in their own right, custodial parent information will always be sent for minor subscribers when known. |
| 2100G |  | Responsible Person Loop |  | The Custodial Parent loop and the Responsible Person loop may both be transmitted for an enrollment. |
| 2100G | NM1 | Responsible Person |  |  |
|  | NM101 | Entity Identifier Code |  | Will transmit "QD" (Responsible Party) or "S1" (Parent) as appropriate. |
|  | NM109 | Responsible Party Identifier |  | Will transmit the SSN when known. |
| 2100G | PER | Responsible Person Communication Numbers |  |  |
|  | PER03 | Communication Number Qualifier |  | Will transmit three communication contacts --- home phone, work phone, cell phone, or email address --- when the information is available.  Communication contacts will be sent in the following order: 1st --- Primary Phone ("TE") 2nd --- Secondary Phone ("AP") 3rd --- Preferred Communication Method ("EM" for email or "BN" for a phone number for receiving text messages). If no preferred communication method is chosen, the 3rd communication contact will not be sent. |
| 2100H |  | Drop-Off Location Loop |  | This loop will never be transmitted. |
| 2200 |  | Disability Information Loop |  | This loop will never be transmitted. |
| 2300 | HD | Health Coverage |  |  |
|  | HD03 | Insurance Line Code | HLT DEN | Will transmit coverage information for the qualifiers shown, as applicable. |
| 2300 | DTP | Health Coverage Dates |  |  |
|  | DTP01 | Date Time Qualifier | 348 | "Benefit Begin" - On initial enrollment the effective date of coverage will be provided. |
| 2300 | REF | Health Coverage Policy Number |  |  |
|  | REF01 | Reference Identification Qualifier | CE     E8    1L | Individual: "Class of Contract Code" - QHP ID Purchased is the Assigned Plan Identifier. This is represented as the HIOS Plan ID Component + subcomponent.  Small Business: "Service Contract (Coverage) Number" - Will transmit the Employer Group Number in the associated REF02 element.  Will transmit when the Exchange Assigned Policy Identifier will be conveyed in the associated REF02 element. |
| 2300 | REF | Prior Coverage Months |  | This segment will never be transmitted. |
| 2300 | REF | Identification Card |  | This segment will never be transmitted. |
| 2310 | NM | Provider Information Loop |  | This segment will be transmitted when a provider NPI is available. |
|  | NM101 | Entity Identifier Code | P3 | "Primary Care Provider" |
|  | NM108 | Identification Code Qualifier | XX | Centers for Medicare and Medicaid Services National Provider Identifier |
|  | NM109 | Identification Code |  | The NPI will be transmitted as entered by the subscriber on enrollment. |
|  | NM110 | Entity Relationship Code | 72 | "Unknown" - The exchange will not specify whether the member is an existing patient of the provider. |
| 2320 |  | Coordination of Benefits Loop |  | This loop will be transmitted when other insurance coverage has been identified. |
| 2330 |  | Coordination of Benefits Related Entity Loop |  | This loop will be transmitted when other insurance coverage has been identified. |
| 2700 |  | Member Reporting Categories Loop |  | This loop will be transmitted when additional premium category reporting is appropriate. |
| 2750 | N1 | Reporting Category |  | See Sections 9.5 and 9.6 of the CMS guide for explicit instructions related to the 2750 loop. |

## Enrollment Confirmation/Effectuation Supplemental Instructions - QHP Issuer to VT HBE

An Effectuation/Confirmation transmission is created by the QHP Issuer and sent to the Exchange for 834 initial enrollment transactions that have been successfully processed.

QHP Issuers must return all the information transmitted on the Initial Enrollment Transaction in addition to the information detailed in following table.

Additions of dependent members to an existing subscriber policy will require an Effectuation response.

Exhibit : Initial Enrollment Supplemental Instructions (QHP Issuer to VT HBE)

| Loop | Element | Element Name | Code | Instruction |
| --- | --- | --- | --- | --- |
| Header | BGN | Beginning Segment |  |  |
|  | BGN06 | Original Transaction Set Reference Number |  | Transmit the value from BGN02 in the initial enrollment transaction. |
| Header | QTY | Transaction Set Control Totals |  | If the transaction set control totals sent with the Initial Enrollment transaction are not accurate for this confirmation/effectuation, transmit accurate totals instead of the values received in the Initial Enrollment transaction. |
|  | QTY01 | Quantity Qualifier | TO     DT  ET | Total. Will transmit to indicate that the value conveyed in QTY02 represents the total number of INS segments in this ST/SE set. It is required for all transactions.  Dependent Total. Will transmit to indicate that the value conveyed in QTY02 represents the total number of INS segments in this ST/SE set with INS01 = "N". It is required for all transactions.  Employee Total. Will transmit to indicate that the value conveyed in QTY02 represents the total number of INS segments in this ST/SE set with INS01 = "Y". |
| 2000 | INS | Member Level Detail |  |  |
|  | INS03 | Maintenance Type Code | 021 | “Addition” |
|  | INS04 | Maintenance Reason Code | 28 | “Initial Enrollment” |
| 2000 | REF | Member Supplemental Identifier |  |  |
|  | REF01 | Reference Identification Qualifier | 23   ZZ | Transmit with the QHP Issuer Assigned Member ID conveyed in REF02.  Transmit with the QHP Issuer Assigned Subscriber ID conveyed in REF02. |
| 2100B |  | Incorrect Member Name Loop |  | Do not transmit this loop unless it was included in the 834 transaction that is being confirmed. |
| 2300 | DTP | Health Coverage Dates |  | Only 1 iteration required. |
|  | DTP01 | Date Time Qualifier | 348 | "Benefit Begin" - The Actual Enrollment Begin Date must be transmitted when confirming initial enrollment transactions. |
| 2300 | REF | Health Coverage Policy Number |  |  |
|  | REF01 | Reference Identification Qualifier | X9 | Transmit with the QHP Issuer assigned Health Coverage Purchased Policy Number conveyed in the associated REF02 element. |
| 2700 |  | Member Reporting Categories Loop |  | One iteration of this loop is required for all confirmations. |
| 2750 | N1 | Reporting Category |  | See Sections 9.5 and 9.6 of the CMS guide for explicit instructions related to the 2750 loop. |
|  | N102 | Member Reporting Category Name |  | "ADDL MAINT REASON" |
| 2750 | REF | Reporting Category Reference |  |  |
|  | REF01 | Reference Identification Qualifier | 17 | "Client Reporting Category" |
|  | REF02 | Member Reporting Category Reference ID |  | Transmit this text: "CONFIRM" |

## 834 Confirmation Messages – VT HBE to QHP Issuer, QHP Issuer to VT HBE

As previously described, QHP Issuers are required to send an effectuated 834 only in response to 834 initial enrollment messages sent by the VT HBE.

In response to all other non-initial enrollment 834 messages sent by either the VT HBE or QHP Issuer, such as change, cancel, terminate, and reinstatements, an 834 “confirmation” message will be sent to confirm successful processing.

The “confirmation” message should include the data sent on the originating 834 message, along with any data elements that were modified after processing by the receiving system. This message should represent an end state reflection of 834 after a QHP Issuer’s internal processing has occurred.

The key distinction between the two types of confirmation messages is that an Effectuation is populated with several data elements that differ from the initial enrollment message, such as subscriber identifiers, member identifiers, transaction totals, and maintenance types. In contrast, the “confirmation” message contains a copy of the enrollment related data after it has been processed.

The 834 confirmation message will not be sent if an error occurs during processing of an 834 transaction.

## Error Message – VT HBE to QHP Issuer, QHP Issuer to VT HBE

In situations where an 834 message is unable to be processed by either the VT HBE or QHP Issuer due to logical errors, a special Error will be sent in place of the 834 confirmation.

This structure and content of this Error message is specified in the following table.

Exhibit : Error Message Structure

| Data Item | Type | Mandatory | Description | Min | Max |
| --- | --- | --- | --- | --- | --- |
| MessageID | AlphaNumeric | Yes | This value must be populated with the reference identification number from BGN02 belonging to the transaction that produced the error. |  |  |
| ProcessDate | Numeric | Yes | CCYYMMDDHHMMSS | 14 | 14 |
| ErrorSource | AlphaNumeric | Yes | An identifier specifying the system sending this error message. | 2 | 50 |
| CompareType | Numeric | Yes | A flag indicating the method that was used to process the 834. Must be one of the following values:  0 System Process  1 Manual Review | 1 | 1 |
| ErrorSummary | AlphaNumeric | No | This is a free text field used to provide additional description of the error that occurred. | 1 | 500 |
| ErrorCode | AlphaNumeric | Yes | A value corresponding to an item in the list of error codes in the following table. | 1 | 3 |

The following table lists error codes.

Exhibit : Error Codes

| Error Code | Description |
| --- | --- |
| 01 | Data Error |
| 02 | Mandatory Column(s) are missing |
| 03 | Invalid Date |
| 04 | Individual is under the minimum age limit |
| 05 | Dependent age exceeds allowed age limit (need more detail on child only coverage) |
| 06 | Invalid Zip Code |
| 07 | Group, Sublocation, & Division are not active on the submitted effected date OR are invalid |
| 08 | Submitted Rate Code is not valid |
| 09 | Employee Coverage Tier does not cover Dependent |
| 10 | City/State does not match with Cities/States associated with submitted Zip |
| 11 | Individual who dropped off the current eligibility file and were Terminated |
| 12 | Mandatory Column(s) are missing in the Address Information. |
| 13 | Date of birth is more than 120 years in the past. |
| 14 | Supplied data contains one or more invalid characters. |
| 15 | Supplied data contains one or more invalid characters. |
| 16 | Member is active on 2 policies (ie: Shop and Individual) |
| 17 | No SSN or non SSN number provided |
| 18 | Invalid benefit selection |
| 19 | Benefit/Tier/Premium submitted do not equal |
| 20 | Benefit/Tier/CSR submitted do not equal |
| 21 | Cancel date is more than 30 days retro |
| 22 | Termination is retro more than 90 days |
| 23 | Member effective date before Group Original Effective Date |
| 24 | Member termination date after Group Termination Date |
| 25 | Member Plan not active for Group |
| 26 | APTC Effective Date prior to Member’s Original Effective Date |
| 27 | Address1 not provided |
| 28 | City not provided |
| 29 | State not provided |
| 30 | Zip not provided |
| 31 | Zip not 5 or 9 digits |
| 32 | DOB is greater than current date |
| 33 | DOB is greater than Plan effective date |

## Cancelation Instructions – VT HBE to QHP Issuer

An 834 cancelation transaction is used in a situation where specific individual market coverage is cancelled prior to the effective date of enrollment.

Enrollment Cancelation Messages will only be sent from the VT HBE to the QHP Issuer.

A cancellation can be initiated by the Exchange any time prior to the effective date of the initial coverage. Situations where the Exchange may cancel an enrollment include an individual getting coverage through an employer prior to the start of coverage, or an individual moving out of a coverage area before coverage is started.

In situations where the QHP Issuer needs to cancel coverage prior to the effective date due to death, fraud, or non-payment, the Issuer will contact a representative at the VT HBE, who will initiate the cancelation.

Information specific to the VT HBE implementation of cancelation transactions is outlined in the following table.

Exhibit : Enrollment Cancelation Instructions

| Loop | Element | Element Name | Code | Instruction |
| --- | --- | --- | --- | --- |
| 2000 | INS | Member Level Detail |  |  |
|  | INS03 | Maintenance Type Code | 024 | "Cancellation or Termination" |
|  | INS04 | Maintenance Reason Code |  | Any valid Maintenance Reason Code may be used. |
| 2000 | REF | Subscriber Identifier |  |  |
|  | REF02 | Subscriber Identifier |  | The Exchange Assigned ID of the primary coverage person. |
| 2000 | REF | Member Supplemental Identifier |  | Transmit The IDs shown below when they were present on the Initial Enrollment |
|  | REF01 | Reference Identification Qualifier | 17   23 | When the Exchange Assigned Member ID is conveyed in REF02.  When the QHP Issuer Assigned Member ID is conveyed in REF02. |
| 2000 | DTP | Member Level Dates |  |  |
|  | DTP01 | Date Time Qualifier | 357 | Eligibility End Date |
|  | DTP03 | Status Information Effective Date |  | The eligibility end date of the termination must be transmitted. |
| 2300 | DTP | Health Coverage Dates |  |  |
|  | DTP01 | Date Time Qualifier | 349 | Benefit End Date |
| 2700 |  | Member Reporting Categories Loop |  | One iteration of this loop is required for all cancellations. |
| 2750 | N1 | Reporting Category |  | See Sections 9.5 and 9.6 of the CMS guide for explicit instructions related to the 2750 loop. |
|  | N102 | Member Reporting Category Name |  | "ADDL MAINT REASON" |
| 2750 | REF | Reporting Category Reference |  |  |
|  | REF01 | Reference Identification Qualifier | 17 | "Client Reporting Category" |
|  | REF02 | Member Reporting Category Reference ID |  | Transmit this Text: "CENCEL" |

## Enrollment Termination Supplemental Instructions - VT HBE to QHP Issuer, QHP Issuer to VT HBE

A termination transaction can be initiated by either the Exchange or the QHP Issuer. A termination transaction is initiated in situations when the enrollment is to be ended after the effective date of coverage.

The Exchange may initiate a termination transaction for any valid reason; however the QHP issuer is only permitted to initiate a termination for non-payment of coverage, death of the member, or fraud.

When coverage is terminated, the benefit end dates must always be prospective – either the end of the current month, or a subsequent month. However, when termination is due to death of the member, the benefit end date will be retroactive to the end of the month of death.

Information specific to the VT HBE implementation of termination transactions is outlined in the following table.

Exhibit : Enrollment Termination Instructions

| Loop | Element | Element Name | Code | Instruction |
| --- | --- | --- | --- | --- |
| 2000 | INS | Member Level Detail |  |  |
|  | INS03 | Maintenance Type Code | 024 | "Cancellation or Termination" |
|  | INS04 | Maintenance Reason Code | 59 | VT HBE <-- QHP Issuer. The following is the only valid reason for a QHP to terminate coverage:  "59 - Non Payment" - Nonpayment of Premium.  VT HBE --> QHP Issuer. Any valid Maintenance Reason Code may be used. |
| 2000 | REF | Subscriber Identifier |  |  |
|  | REF02 | Subscriber Identifier |  | The Exchange Assigned ID of the primary coverage person. |
| 2000 | REF | Member Supplemental Identifier |  | Transmit The IDs shown below when they were present on the Initial Enrollment |
|  | REF01 | Reference Identification Qualifier | 17   23 | When the Exchange Assigned Member ID is conveyed in REF02.  When the QHP Issuer Assigned Member ID is conveyed in REF02. |
| 2000 | DTP | Member Level Dates |  |  |
|  | DTP01 | Date Time Qualifier | 357 | Eligibility End Date |
|  | DTP03 | Status Information Effective Date |  | The eligibility end date of the termination must be transmitted. |
| 2300 | DTP | Health Coverage Dates |  |  |
|  | DTP01 | Date Time Qualifier | 349 | Benefit End Date |
| 2700 |  | Member Reporting Categories Loop |  | One iteration of this loop is required for all cancellations. |
| 2750 | N1 | Reporting Category |  | See Sections 9.5 and 9.6 of the CMS guide for explicit instructions related to the 2750 loop. |
|  | N102 | Member Reporting Category Name |  | "ADDL MAINT REASON" |
| 2750 | REF | Reporting Category Reference |  |  |
|  | REF01 | Reference Identification Qualifier | 17 | "Client Reporting Category" |
|  | REF02 | Member Reporting Category Reference ID |  | Transmit this Text: "TERM" |

## Other Transaction Instructions

### Member Reporting Categories Loop

The VT HBE will report APTC, CSR, and small business employer contribution amounts to QHP issuers in the 834 Member Reporting Categories Loop using the mechanism identified in the *CMS Companion Guide for the Federally Facilitated Exchange (FFE)*.

The Vermont CSR amount will be reported in the “Another payment amount” category, which is identified with an N102 value of “OTH PAY AMT 1.” If a subscriber is not eligible for the Vermont CSR, then this value will be 0.

Specific instructions for reporting these values can be found in Sections 9.5 and 9.6 of the *CMS Companion Guide*.

### Change Transactions - VT HBE to QHP Issuers

The VT HBE will issue a standard 834 Change transaction to update information that has changed. Examples of this would be changes in member name and/or contact information.

The VT HBE will be the system of record for member information. Consequently, QHP issuers will not initiate a Change transaction.

### Individual Market Re-Enrollment Supplemental Instructions - VT HBE to QHP Issuer

A re-enrollment transaction is generated when a member, who has been terminated, needs to be re-enrolled under a new subscriber using a previously supplied QHP Issuer member identifier.

A potential reason for this transaction would be when the subscriber is no longer eligible and the remaining members of the enrollment group need to be re-enrolled under a new subscriber.

In this situation, the previous QHP issuer subscriber identifier will be conveyed as a member supplemental identifier, accompanied by the Exchange generated subscriber identifier for the new subscriber.

QHP Issuers will respond to a re-enrollment transaction with an 834 effectuation.

Only the Exchange can initiate Re-Enrollment transactions.

Except as noted in the table below, the Reinstatement transaction will contain all the information transmitted on the Initial Enrollment Transaction.

Exhibit : Re-enrollment Instructions

| Loop | Element | Element Name | Code | Instruction |
| --- | --- | --- | --- | --- |
| 2000 | INS | Member Level Detail |  |  |
|  | INS04 | Maintenance Reason Code | 41 | "Re-enrollment" |
| 2000 | REF | Member Supplemental Identifier |  | Transmit the IDs shown below when they were present on the Initial Enrollment |
|  | REF01 | Reference Identification Qualifier | Q4 | "Prior Identifier Number." When the previous QHP Issuer Assigned Subscriber ID will be conveyed in REF02. |

### Reinstatement Instructions, VT HBE to QHP Issuer

A Reinstatement transaction is generated when an enrollee who has been cancelled or terminated needs to be reinstated.

All reinstatement transactions will be initiated by the VT HBE. In situations where a QHP Issuer needs to reinstate coverage, this will be communicated to the VT HBE support staff, who will initiate the transaction.

QHP Issuers will respond to reinstatement transactions with an 834 confirmation.

Except as noted in the following table, the Reinstatement transaction will contain all the information transmitted on the Initial Enrollment Transaction.

Exhibit : Reinstatement Instructions

| Loop | Element | Element Name | Code | Instruction |
| --- | --- | --- | --- | --- |
| 2000 | INS | Member Level Detail |  |  |
|  | INS04 | Maintenance Reason Code | 41 | In the context of a Reinstatement, the "Re-enrollment" code will be used. |

### Change in Health Coverage

The VT HBE will send two Coverage Level Change transactions to the QHP Issuer when an enrollee’s health coverage level changes.

The first Coverage Level Change transaction will communicate a health coverage termination for the prior coverage level, followed by a second Coverage Change transaction to convey enrollment in the new health coverage level (new coverage).

When coverage is terminated in this scenario, the benefit end dates must always be prospective – either the end of the current month, or a subsequent month. The benefit begin date for the new coverage specified in the new enrollment transaction will be the first of the following month.

### Change in Circumstance - Newborns

When the VT HBE receives notification of a newborn, a “pre-enrollment” 834 message will be sent to QHP Issuers to notify them of the child. This “pre-enrollment” period represents the 31-day span of time from the date of birth when the Issuer is legally required to provide coverage for the child.

In this 834 transaction, the Maintenance Type Code in INS03 of the Member Level Detail loop will be set to "021", for the member addition. The Maintenance Reason Code in INS04 will be set to “27”, corresponding to "Pre-Enrollment."

At the end of the 31-day period, the VT HBE will transmit an 834 with a Maintenance Type Code in INS03 of the Member Level Detail loop set to "024", which signifies the end of the coverage period for the newborn.

Coverage must be selected for the newborn within 60 days from the date of birth. Once coverage for the newborn is selected, the VT HBE will transmit the new enrollment to QHP Issuers according to the instructions provided in the section of this guide that describes initial enrollment.

### Termination Due to Address Change

The VT HBE will send two transactions to the QHP Issuer when a change of address results in a QHP termination. The first transaction will communicate the change of address and the second will initiate the termination.

### Supported Relationship Codes

The table below lists the relationship codes that the VT HBE may transmit in INS02 of the Member Level Detail loop of the 834 message.

Exhibit : Relationship Codes

| Relationship Code | Description |
| --- | --- |
| 01 | Spouse |
| 03 | Father or Mother |
| 04 | Grandfather or Grandmother |
| 05 | Grandson or Granddaughter |
| 06 | Uncle or Aunt |
| 07 | Nephew or Niece |
| 08 | Cousin |
| 09 | Adopted Child |
| 10 | Foster Child |
| 15 | Ward |
| 16 | Stepparent |
| 17 | Stepson or Stepdaughter |
| 18 | Self |
| 19 | Child |
| 26 | Guardian |
| G8 | Other Relationship |
| G9 | Other Relative |

## Reconciliation Process

The VT HBE requires QHP issuers to reconcile enrollment files with the VT HBE on a regular basis in order to identify irregularities between the records contained in each system.

### Frequency

In the initial stages of the VT HBE operation, reconciliation will take place on a weekly basis. The intention is to identify anomalies and exceptions scenarios as early as possible, in an effort to respond quickly and minimize the impact of issues.

After any critical issues in the enrollment process have been addressed, the frequency of reconciliation will shift to a monthly basis.

### Reconciliation Message

The VT HBE will send a QHP issuer a standard 834 “audit or compare” message with a Maintenance Type Code of “030,” which will contain all enrollment data for the active enrollments present on that day.

The QHP Issuers will also send their own 834 audit file to the VT HBE containing active enrollments for the same period.

### Issues Identified Through Reconciliation

QHP issuers are required to independently devise a suitable methodology to identify discrepancies between their records and the reconciliation file provided by the VT HBE. The VT HBE will apply its own processes for comparing a QHP Issuer’s audit file against records in the Exchange.

Any issues identified by QHP issuers will be reported to the VT HBE. Likewise, the VT HBE will report any issues to QHP issuers.

Initially, the resolution of issues identified through the reconciliation process will be a manual process.

# Problem Resolution

Section 4.2 of the *Carrier Enrollment – Individual and Employee Interface Control Document* describes the sequence of steps that take place in order to carry out each of the Group and Enrollment operations.

When carrying out these operations, the system processing the operation can encounter logical errors or timeouts in SLA thresholds, which cause the failure of the operation.

As described earlier, the Error message will provide a structure for signaling errors and transmitting error details. This information will be important in order to provide the necessary context for evaluating the severity of the issue and initiating the appropriate steps for successful resolution.

The following sections describe how to address situations when the party initiating an operation sends a request that cannot be processed by the party receiving the message.

## Business Processes

The following sections define the specific problem resolution processes that will be followed when an issue is encountered during each operation.

### Create Employer Group

During the employer group creation process, the VT HBE calls the Carriers’ Group Web Service with an operation type of “Create”.

The Carrier receives the request, and conducts its own internal processing.

If the Carrier encounters a logical issue that prevents the creation of the Group, the following problem resolution procedure is followed:

1. VT HBE receives the error notification from Carrier.
2. VT HBE adds the error to an internal error work list.
3. Customer service representative is assigned the error and contacts the carrier.
4. The VT HBE and Carrier work to resolve the underlying issues through manual processes.
5. One of the following actions completes the transaction:
   1. Transaction re-attempted without modification.
   2. Data in transaction is changed, transaction re-attempted.
   3. Group created manually.

### Group Maintenance – Initiated by VT HBE

During the VT HBE initiated Group Maintenance process, the VT HBE calls the Carrier Group Web Service with an action type of “Change” and posts the request internally, expecting a callback.

If the Carrier cannot perform the requested change, the following problem resolution process is carried out:

1. VT HBE receives the error notification from Carrier.
2. VT HBE adds the error to an internal error work list.
3. Customer service representative is assigned the error and contacts the carrier.
4. The VT HBE and Carrier work to resolve the underlying issues through manual processes.
5. One of the following actions completes the transaction:
   1. Transaction re-attempted without modification.
   2. Data in transaction is changed, transaction re-attempted.
   3. Group change made manually.

### Group Maintenance Initiated by Carrier

During the Carrier initiated Group Maintenance process, the Carrier calls the VT HBE Group Web Service with an action type of “Change” and posts the request internally, expecting a callback.

If the VT HBE cannot perform the requested change, the following problem resolution process is carried out:

1. Carrier receives the error notification from VT HBE.
2. Carrier adds the error to an internal error work list.
3. Customer service representative is assigned the error and contacts the VT HBE.
4. The VT HBE and Carrier work to resolve the underlying issues through manual processes.
5. One of the following actions completes the transaction:
   1. Transaction re-attempted without modification.
   2. Data in transaction is changed, transaction re-attempted.
   3. Group change made manually.

### Employee Enrollment

Employee enrollment occurs at the point that a) the Group has been confirmed and b) VT HBE has received notice of initial premium payment settlement. The VT HBE will ‘package’ up all current enrollees in a particular Group and call the Carrier’s Enroll Web Service.

The Carrier(s) asynchronously process the enrollments and for all successful enrollees make a call with Effectuated data to the VT HBE’s Enroll Callback Web Service.

For those enrollments that could not be processed, the following problem resolution process is carried out:

1. VT HBE receives the error notification from Carrier.
2. VT HBE adds the error to an internal error work list.
3. Customer service representative is assigned the error and contacts the carrier.
4. The VT HBE and Carrier work to resolve the underlying issues through manual processes.
5. One of the following actions completes the transaction:
   1. Transaction re-attempted without modification.
   2. Data in transaction is changed, transaction re-attempted.
   3. Enrollment done manually.

### Employee Maintenance Initiated by VT HBE

During employee maintenance, the VT HBE calls the Carrier Enroll Web Service, with an action of “Change” and corresponding data are provided to indicate the nature of the change.

If the enrollment change request sent by the VT HBE cannot be carried out, the following resolution process is carried out:

1. VT HBE receives the error notification from Carrier.
2. VT HBE adds the error to an internal error work list.
3. Customer service representative is assigned the error and contacts the carrier.
4. The VT HBE and Carrier work to resolve the underlying issues through manual processes.
5. One of the following actions completes the transaction:
   1. Transaction re-attempted without modification.
   2. Data in transaction is changed, transaction re-attempted.
   3. Enrollment change done manually.

### Employee Maintenance Initiated by Carrier

When employee maintenance is initiated by the Carrier, the Carrier calls the VT HBE Enroll Web Service with an action type of “Change,” along with other appropriate data.

The VT HBE asynchronously evaluates the change request, applies known business logic and appropriate business rules to the request and evaluates validity.

If the request is not valid, the following resolution process is carried out:

1. Carrier receives the error notification from VT HBE.
2. Carrier adds the error to an internal error work list.
3. Customer service representative is assigned the error and contacts the VT HBE.
4. The VT HBE and Carrier work to resolve the underlying issues through manual processes.
5. One of the following actions completes the transaction:
   1. Transaction re-attempted without modification.
   2. Data in transaction is changed, transaction re-attempted.
   3. Employee change made manually.

### Individual Enrollment

During individual enrollment, the VT HBE formulates an enrollment message and calls the appropriate Carrier’s Enroll Web Service.

If the Carrier cannot complete the enrollment successfully, the following resolution process is carried out:

1. VT HBE receives the error notification from Carrier.
2. VT HBE adds the error to an internal error work list.
3. Customer service representative is assigned the error and contacts the carrier.
4. The VT HBE and Carrier work to resolve the underlying issues through manual processes.
5. One of the following actions completes the transaction:
   1. Transaction re-attempted without modification.
   2. Data in transaction is changed, transaction re-attempted.
   3. Enrollment done manually.

### Individual Enrollment Maintenance Initiated by VT HBE

When individual enrollment maintenance is initiated by the VT HBE, the VT HBE formulates an appropriate message and calls the Carrier Enroll Web Service, indicating a ‘Change’ request.

If the Carrier cannot process the request as sent, the following problem resolution process is carried out:

1. VT HBE receives the error notification from Carrier.
2. VT HBE adds the error to an internal error work list.
3. Customer service representative is assigned the error and contacts the carrier.
4. The VT HBE and Carrier work to resolve the underlying issues through manual processes.
5. One of the following actions completes the transaction:
   1. Transaction re-attempted without modification.
   2. Data in transaction is changed, transaction re-attempted.
   3. Enrollment change done manually.

### Individual Enrollment Maintenance Initiated by Carrier

When individual enrollment maintenance is initiated by a Carrier, the Carrier packages the message appropriately and calls the VT HBE Enroll Web Service, indicating a ‘Change’ action.

If VT HBE determines that the request is invalid for some reason, the following resolution process will be carried out:

1. Carrier receives the error notification from VT HBE.
2. Carrier adds the error to an internal error work list.
3. Customer service representative is assigned the error and contacts the VT HBE.
4. The VT HBE and Carrier work to resolve the underlying issues through manual processes.
5. One of the following actions completes the transaction:
   1. Transaction re-attempted without modification.
   2. Data in transaction is changed, transaction re-attempted.
   3. Enrollment change made manually.

# Security

## Web Service Security Standards

### WS-Security

One of the most important elements of an interface is the reliable application of appropriate security levels; further, we need to strike a balance between the very strict privacy mandates we face with the performance needs of the VT HBE system.

Standardized security for web services is provided through a very mature, well-tested model described in the OASIS WS-Security specification.

Depicted below is a fully WS-Security compliant layer for a web service request/response pair. This consists of:

1. Transport layer security (SSL)
2. A two-phase process using both symmetric and asymmetric algorithms.
3. A shared key that is used to encrypt/decrypt the message data using a symmetric algorithm such as Triple DES. Symmetric algorithms are very efficient and work with a single key for both encryption and decryption calculations. WS-Security implementations use a key that is randomly generated. Once the data of the message is encrypted, the key itself is inserted into the message. (Note that the key is also encrypted as described below.)
4. Passing the shared key in the SOAP message with the key encrypted/decrypted using an asymmetric algorithm such as RSA-V1.5. Encryption of the shared key is performed differently than the message data with an algorithm that utilizes a pair of keys -- private and public. An X.509 certificate has two keys, one that is private to the owner of the certificate and a second key that is shared with others with whom they are conducting business. Symmetric algorithms are more efficient than asymmetric algorithms; however, they require management of shared keys between the parties and have inherent security risks of their being exposed to others outside of your organization or business partners. By using only asymmetric algorithms on the random key, WS-Security provides both a relatively efficient solution and one that is easy to manage.

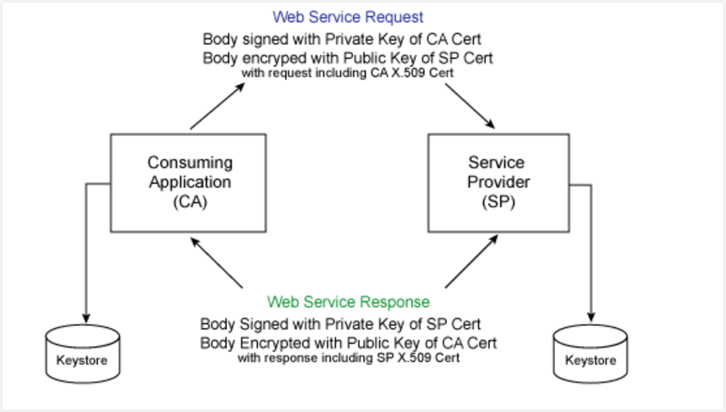


Exhibit : Web Service Request

Note that the implementation of this full set of security measures is an application of layers. Two of these layers require careful coordination of security keys between message exchangers, and multiple types of encryption/decryption per message exchange. The full implementation also requires the provision of formal security certificates.

### WS-ReliableMessaging

WS-RM, another in the OASIS WS-\* specification family, describes three levels of reliability assurance for web service messages.

1. Unmanaged, non-persistent
   1. In-memory store
   2. Non-transactional
   3. Cannot support server clustering
   4. Can survive network failure
2. Managed, non-persistent
   1. In-memory store
   2. Transaction and message sequencing support
   3. Cluster support
   4. Can survive network and server failure
3. Managed, persistent
   1. Queue store
   2. Transaction and message sequencing support
   3. Cluster support
   4. Can survive network, server and messaging engine failure (fully recoverable)

Again, each of these levels brings additional overhead to the infrastructure as well as the application layer. The goal, much as in WS-Security, is to strike an effective balance in the use of the various levels of implementation.

## File Transfers

Though the use of file transfers as a communication mechanism is intended to be limited only to those scenarios where absolutely appropriate (reports, reconciliation data, etc.), there will still be significant security and reliability issues to be concerned with.

Below is a SFTP-based approach (using communication of a file to a Carrier Hub as an example) that CGI believes meets these concerns.

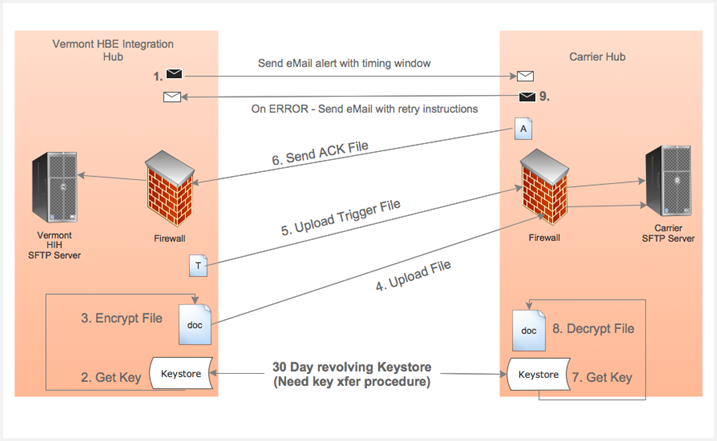


Exhibit : SFTP File Transfer Approach

Briefly, the model above provides for the following:

* Security via the following:
* SSL transport layer
* Asymmetric encryption with secure key store exchanges
* Reliability via the following:
* Alerts that establish a file transmission “timing window”
* Use of a ‘trigger’ file to explicitly identify that a target file was uploaded in its entirety
* Use an a response (‘Ack’) file to indicate that the recipient confirms successful upload

## Monitoring

We have identified a minimum set of requirements that we would consider adequate across five high-level monitoring areas of focus. These may be met by a spectrum of COTS packages, EA services, and customized software.

The general goal would be to provide the means by which the health of the SOA system, its underlying infrastructure, and the utilities necessary to its effective messaging can be easily observed in a real-time (or ‘dashboard’) fashion.

* Connection
* Monitor service connectivity from the server and from the External Partners
* Provide ‘ping’ tests that run on a schedule and report to an Admin-accessible dashboard
* Log on a scheduled basis
* Server
* Monitor all relevant supporting processes; check utilization levels of the server against pre-established thresholds
* Notify and log
* System and Services
* Identify key software that should be running
* Set expected performance levels if any and then monitor and log
* Provide Admin-accessible dashboard status
* Business Logic Testing
* Have regularly running scripts testing any system workflows and then monitor and log
* Provide Admin-accessible dashboard status
* SOA performance
* Establish capacity and flow-through SLA’s
* Implement SOA Suite BAM events at key points to provide real-time measures and then monitor and log
* Provide Admin-accessible dashboard status

# Interoperability Testing

Carrier testing with the VT HBE will include connectivity, payload, and scenario testing. All carriers will be required to successfully complete a baseline set of test scenarios before go-live is approved. Throughout the testing process carriers and the VT HBE will enable a consistent communication and defect resolution process.

## Credentialing

The first step in the testing process will be for the VT HBE and the Carriers to complete agreements to allow for EDI and Web Service Connections to be set up and to exchange the appropriate credentialing information.

## Connectivity Testing

Connectivity Testing will include an interface to interface hand shake to confirm system communication. It will not verify whether or not the transmitted data is accurate.

## Payload Testing

The VT HBE will send fully populated payload tests with different transactions that the Carrier test team will evaluate for accuracy. Carriers will also send fully populated payload tests with different transactions which the VT HBE test team will evaluate for accuracy.

## Scenario Testing

The VT HBE will create a full set of detailed scenarios that cover a carrier’s integration with the Exchange. This will include business logic for each type of transaction that was completed in the Payload Testing.

## Operational Readiness Testing

The primary goal of this phase is to help ensure that the VT HBE and Carriers have exchanged credentials and provisioned those credentials for production operations. The VT HBE and the Carriers will need to verify connectivity is working and ready for October 1, 2013.

## Production Connectivity Testing

Connectivity Testing in Production will entail an interface to interface hand shake to confirm the VT HBE and Carriers systems can communicate with one another.

## Defect Tracking

A defect tracking protocol will be established to define processes for defect tracking, reporting, and the required informational content for defects.

Appendix A: Enrollment Scenarios – Individual

(No Payment elements included)

1. Joe Smith, with a wife and child, registers on the Exchange, qualifies for APTC, sets his amount, is verified, and selects Plan X from Carrier Z for the household, and Dental from Carrier D. His child qualifies for Medicaid, due to a disability.
   1. He pays the first month’s premium with his credit card, through the exchange
   2. Two days later, the payment is successfully settled

* VT HBE sends an 834 to Carrier Z (for Joe and Wife only)
* Carrier Z sends Effectuated 834
* VT HBE sends an 834 to Carrier D (for Joe and Wife only)
* Carrier D sends Effectuated 834

1. One month later, Joe changes his APTC monthly amount

* VT HBE sends an 834 to Carrier Z
* Carrier Z sends 834 Confirmation (reflecting only sent data)

1. Three months later, his wife gives birth and he adds the second child to the coverage

Note: At present, Vermont issuers automatically cover newborns for 31 days after birth, identified without names via notification from hospital of birth. No premium adjustments are made during this period.  
  
The State of Vermont is evaluating best way to handle this process for VT HBE.

1. Joe fails to make his next payment
   1. He gets a notice from Carrier Z
   2. Because Joe is APTC – qualified, this warning period extends for 90 days. (If he were non-APTC, this would extend only to a 30 day grace period)
2. Joe fails to make the following next two month’s payments as well, carrying his overdue status to 91 days

* Carrier Z cancels Joe, sends an 834 to VT HBE
* VT HBE verifies with an 834 Confirmation
* VT HBE flags Joe (in the system) as canceled for non-payment

1. The following month, Joe tries to enter the Exchange and enroll in a new plan

* VT HBE prevents Joe from enrolling

1. At the next open enrollment, Joe again enrolls in a plan through the Exchange, with all the previous coverage and qualifications.

* VT HBE sends an 834 to Carrier Z (for Joe and Wife only)
* Carrier Z sends Effectuated 834
* VT HBE sends an 834 to Carrier D (for Joe and Wife only)
* Carrier D sends Effectuated 834

1. Path A: He pays on time for six months, and then changes employment. His new employer provides healthcare coverage through Carrier E, so Joe enters the Exchange and cancels his current policy.

* VT HBE sends 834 Termination to Carrier Z
* Carrier Z sends 834 Confirmation
* VT HBE sends 834 Termination to Carrier D
* Carrier D sends 834 Confirmation
* VT HBE sends 834 Enrollment to Carrier E
* Carrier E sends Effectuated 834

1. Path B: He pays on time for six months, and then changes employment. His new employer provides healthcare coverage, so Joe simply stops paying.
   1. He gets notice from his Carrier

* 91 days later, he’s canceled for non-payment and flagged in the system

Note: This would prevent him from re-enrolling as an individual in that plan year if he were to lose his job, or change to an employer that did not offer a Group plan. Resolving this would be a manual process through Customer Service (Joe would need to call).

Appendix B: Acronyms

The following table is a list of acronyms introduced in this document.

Exhibit : List of Acronyms

|  |  |
| --- | --- |
| Acronym | Description |
| CMS | Centers for Medicare & Medicaid Services |
| HIH | VT HBE Integration Hub |
| ICD | Interface Control Document |
| LDM | Logical Data Model |
| OPA | Oracle Policy Automation |
| PGP | Pretty Good Privacy |
| SDD | System Design Document |
| SFTP | Secure File Transfer Protocol |