

Cost-Sharing Reduction Reconciliation Issuer to MIDAS Inbound Specification

Publication: December 2024

Version: 5.0

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0938-1266. This information collection may be used, but is not required to be used, by qualified health plan (QHP) issuers through the individual market on the Exchanges to understand the data collection and reporting requirements related to the calculation of reconciled cost-sharing reduction (CSR) amounts. This form aims to simplify the process for QHP issuers submitting CSR data particularly in the consideration of settlement and judgment amounts in litigation brought by issuers against HHS related to the lack of advance CSR payments. The time required to complete this information collection is estimated to average 15.75 hours per response, including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection. The use of this information collection is voluntary per CMS regulations at 45 CFR 156.430(d). If you have comments concerning the accuracy of the time estimate(s) or suggestions for improving this form, please write to: CMS, 7500 Security Boulevard, Attn: PRA Reports Clearance Officer, Mail Stop C4-26-05, Baltimore, Maryland 21244-1850.

Table of Contents

01 Issuer Summary Record	3
02 Plan Summary Record (Optional).....	6
03 Policy Detail Record	8
CSR Reconciliation Business Validations for Issuer, Plan and Summary.....	11
Appendix A	15
Appendix B	16

ITC-ICSRRL0

CSR Reconciliation Inbound Specification

The purpose of this document is to provide the details on cost-sharing reduction (CSR) reconciliation files that issuers submit to the Multidimensional Insurance Data Analytics System (MIDAS). This specification document (version 4.0) is applicable to CSR reconciliation for the 2021 benefit year as well as restatements for benefit year 2020. The issuer will need to submit files to MIDAS in pipe delimited format. The file format that will be used is ASCII text and will use a CRLF as the line terminator. The file submitted by the issuers should have only ONE HIOS identifier. If the issuer is submitting data for multiple HIOS IDs and benefit years, the issuer must create a separate file for each HIOS ID and benefit year. The function code for this submission will be CSRI.

CSR Reconciliation Submission Files:

The filenames proposed for usage by issuers will consist of the following sections:

1. Trading Partner (TP) Identifier (ID)
2. Application ID
3. Function Code
4. Date
5. Time
6. Environment Code

Trading Partner (TP) Identifier (ID):

TPID is the identification number assigned to the Trading Partner. The length of the TPID can range between 5-10 characters. The TPID that should be used for CSR Reconciliation must be the same as that has been used for 820 payments with function code F820.

Application ID:

The Application ID section of the filename is an ID for the application that processes the files. This section specifies the target application where the system routes the file. This is a static value and is MID for this process.

Function Code:

The Function Code section of the filename is an alphanumeric code indicating the functional purpose of the file within the application. This also helps identify specific processing once the system routes the file to the application. This is a static value and is CSRI for all the data.

Date:

The Date section of the filename specifies the date the issuer transferred the file in **DYYMMDD** format. The first **D** is static text.

Time:

The Time section of the filename specifies the time created (timestamp) for the file in **THHMMSSmmm** format where HH is hours, MM is minutes, SS is seconds, and mmm is milliseconds. The **T** is static text and exactly nine numerals must follow.

Environment Code:

The Environment Code section of the filename is a single character code indicating the environment to which the system transfers the file. Allowed values are as follows:

- **P** for Production Environment (PROD)

All the sections need to be separated by a period (.)

Example of a sample filename where the TPID = '12345678': **12345678.MID.CSRI.D180501.T123136760.P**

Data Files Overview

Data files are created by HIOS ID and benefit year and these files should never be zipped.

<u>ID</u>	<u>Name</u>	<u>Min Use</u>	<u>Max Use</u>
01 Issuer Summary Record	ITC-ICSRRL0-Record ID	1	1
02 Plan Summary Record	ITC-ICSRRL0-Record ID	0	N/A
03 Policy Detail Record	ITC-ICSRRL0-Record ID	1	N/A

01 Issuer Summary Record

ITC-ICSRRL0-Record Id

Min Use: 1
Grp:

Max Use: 1
Fields: 27

Issuer Summary Information: Issuer identification, data extraction time and date, methodology, acquisition information, and aggregate amount of actual CSR provided for all qualified health plans (QHPs) under this issuer.

<u>Pos</u>	<u>ID</u>	<u>FIELD</u>	<u>Type</u>	<u>Min Len</u>	<u>Max Len</u>	<u>Requirement</u>
01	101	Record-Code Purpose: Record Code – Always 01 for Issuer Summary Information.	Text	2	2	Mandatory
02	102	Trading Partner ID Purpose: The Trading Partner number assigned.	Text	5	10	Mandatory
03	103	Issuer State Code Purpose: Enter the 2-letter state code for issuer’s state of licensure.	Text	2	2	Mandatory
04	104	HIOS ID Purpose: The five-digit Health Insurance Oversight System (HIOS)–generated Issuer ID number.	Numeric	5	5	Mandatory
05	105	Issuer Extract Date Purpose: Date information extracted by the issuer from the issuer’s data base. Note: Valid date format is MMDDYYYY.	Numeric	8	8	Mandatory
06	106	Issuer Extract Time Purpose: Time information extracted by issuer from the issuer’s data base. Note: Valid format is HHMMSS- (Hour, Minutes, and Seconds).	Numeric	8	8	Mandatory
07	107	Benefit Year Purpose: Date information extracted by the issuer from the issuer’s data base. For restatements, enter benefit year 2020. Note: Valid format is YYYY. The values should be restricted to 2020 or 2021.	Numeric	4	4	Mandatory
08	108	Total Actual CSR Amount Purpose: Total CSR amount provided by this QHP issuer to enrollees in all CSR eligible policies. For restatement files, this is the CSR amount provided by this QHP issuer to enrollees in all (03) Policy Detail Records, including restated policies and policies that are not being restated. Note: Maximum value is 999999999.99 with an explicit decimal. If not available, then initialize to "0.00". The precision is restricted to 2 decimal points.	Numeric	4	12	Mandatory
09	109	Total CSR Amount Advanced to the Issuer by CMS Purpose: Amount the issuer received from CMS for the applicable benefit year.	Numeric	4	12	Optional

Note: If issuers fill this field in, should be filled in as "0.00". The precision is restricted to 2 decimal points.

10	110	Reconciliation Methodology	Text	8	13	Mandatory
		Purpose: Indicates the Reconciliation methodology used, and the only valid values is standard. Pursuant to 45 CFR 156.430(c)(2), for benefit year 2017 and beyond, issuers must use the standard methodology.				
11	111	Acquisition	Text	1	1	Mandatory
		Purpose: Has the issuer HIOS ID filing this reconciliation report been acquired by another issuer in the applicable benefit year? Valid values are Y or N.				
		Note: <u>This field value is case insensitive.</u>				
12	112	Acquisition Effective Dates	Date	0	8	Conditional
		Purpose: Date the acquisition was final. Value is required if the Acquisition is set to Y.				
		Note: The valid date format is MMDDYYYY.				
13	113	Acquiring Issuer	Text	5	5	Conditional
		Purpose: HIOS ID of the acquiring issuer. Value is required if the Acquisition is set to Y.				
14	114	Merger	Text	1	1	Mandatory
		Purpose: Has the issuer (HIOS ID) filing this reconciliation report merged with or absorbed another issuer in the applicable benefit year? Valid values are Y or N.				
		Note: <u>This field value is case insensitive.</u>				
15	115	Merger Issuer	Text	0	5	Conditional
		Purpose: List the HIOS ID of the other issuer(s) party in the merger. Value is required if the Merger is set to Y.				
16	116	Merger Effective Dates	Date	0	8	Conditional
		Purpose: Date the merger was final. Value is required if the Merger is set to Y.				
		Note: Valid date format is MMDDYYYY.				
17	117	Technical POC First Name	Text	2	100	Mandatory
		Purpose: To identify the first name of the technical point of contact (POC) of the issuer.				
18	118	Technical POC Last Name	Text	2	100	Mandatory
		Purpose: To identify the last name of the technical POC of the issuer.				
19	119	Technical POC Email Address	Text	2	100	Mandatory
		Purpose: To identify the email address of the technical POC of the issuer.				
20	120	Technical POC Organization Title	Text	2	100	Mandatory
		Purpose: To identify the organization of the technical POC of the issuer.				
21	121	Technical POC Phone Number	Numeric	10	10	Mandatory
		Purpose: To identify the phone number of the technical POC of the issuer.				
22	122	Business POC First Name	Text	2	100	Mandatory
		Purpose: To identify the first name of the business POC of the issuer.				

23	123	Business POC Last Name	Text	2	100	Mandatory
		Purpose: To identify the last name of the business POC of the issuer.				
24	124	Business POC Email Address	Text	2	100	Mandatory
		Purpose: To identify the email address of the business POC of the issuer.				
25	125	Business POC Organization Title	Text	2	100	Mandatory
		Purpose: To identify the organization of the business POC of the issuer.				
26	126	Business POC Phone Number	Numeric	10	100	Mandatory
		Purpose: To identify the phone number of the business POC of the issuer.				
27	127	Total Number of CSR Variant Plans under this HIOS ID	Numeric	1	100	Mandatory
		Purpose: Total count of CSR plan variations for this QHP issuer. Include plan variations with enrollment only, whether or not CSRs were provided.				
28	128	Total Number of Exchange-assigned Subscriber IDs in all CSR Variant Plans under this HIOS ID	Numeric	1	100	Mandatory
		Purpose: Total count of Exchange-assigned Subscriber IDs associated with a (03) Policy Detail Record in all plan variations for this QHP issuer. For restatement files, this is the total number of (03) Policy Detail Records, including restated policies and policies that are not being restated.				

02 Plan Summary Record (Optional)

ITC-ICSRRL0-Record Id

Min Use: 0
Grp:

Max Use: N/A
Fields: 9

Plan Summary Record: Plan Summary Records are optional. If issuers include (02) Plan Summary Records in their data file submission to MIDAS, the file format validations described below will be enforced. Issuers will send plan-related data elements for all QHPs, including allowed costs for essential health benefit (EHB) claims, amounts paid by the issuer and policy holder, amount the policy holder would pay under the standard plan, and actual CSR provided. Only submit reports for plans with enrollment.

<u>Pos</u>	<u>ID</u>	<u>FIELD</u>	<u>Type</u>	<u>Min Len</u>	<u>Max Len</u>	<u>Requirement</u>
01	201	Record-Code	Text	2	2	Mandatory
		Purpose: Record type to indicate that this refers to the Plan details.				
		Note: Should always be 02 for Plan Summary Record.				
02	202	QHP ID	Text	16	16	Mandatory
		Purpose: Enter the 16-digit HIOS-generated qualified health plan identification number. This includes the 14-digit standard plan ID plus the 2-digit variant ID.				
03	203	Total Annual Premium	Numeric	4	12	Optional
		Purpose: Aggregate billed premium for this plan for the applicable benefit year				
		Note: This is the Total Premium Amount. Maximum value is 999999999.99, with an explicit decimal point. If not available, then initialize to "0.00". No commas should be used in this column. The precision is restricted to 2 decimal points.				
04	204	Total Allowed Costs for EHB	Numeric	4	12	Mandatory
		Purpose: Aggregate total allowed costs (including restated total allowed costs, if submitted as part of a restatement file) for EHB for all enrollees in this plan. Issuers including issuers of capitated plans may use plan-specific percentage estimates of non-EHB claims submitted on the Unified Rate Review Template or any other reasonable method to determine total allowed costs for EHB.				
		Note: This is the Total allowed costs for EHB. Maximum value is 999999999.99, with an explicit decimal point. If not available, then initialize to "0.00". No commas should be used in this column. The precision is restricted to 2 decimal points.				
05	205	Total Actual Amount the Issuer Paid for EHB	Numeric	4	12	Mandatory
		Purpose: The amount (including restated amount, if submitted as part of a restatement file) the issuer paid providers for EHB for all services to enrollees in this plan. This includes CSR reimbursement amounts to fee-for-service providers to the extent the issuer reimbursed fee-for-service providers. Issuers that provide for EHB on a partially or fully capitated basis should enter all amounts paid by the issuer for those services. This value does not include enrollee liability.				
		Note: This is the total actual amount the issuer paid for EHB. Maximum value is 999999999.99, with an explicit decimal point. If not available, then initialize to "0.00". No commas should be used in this column. The precision is restricted to 2 decimal points.				
06	206	Total Actual Amount Paid For EHB by Enrollees	Numeric	4	12	Mandatory

03 Policy Detail Record

ITC-ICSRRL0-Record Id

Min Use: 1
Grp:

Max Use: N/A
Fields: 14

Policy Detail Information: Issuers will send policy related data elements for all QHPs, including Exchange-assigned Subscriber ID, EHB amounts, amounts the issuer and enrollee paid, and actual CSR provided.

<u>Pos</u>	<u>ID</u>	<u>FIELD</u>	<u>Type</u>	<u>Min Len</u>	<u>Max Len</u>	<u>Requirement</u>
01	301	Record-Code	Text	2	2	Mandatory
		Purpose: Record code to indicate that this refers to the Policy details.				
		Note: Should always be 03 for Policy Detail Records.				
02	302	Exchange-assigned Subscriber ID	Text	10	10	Mandatory
		Purpose: The subscriber identification number assigned by the Exchange. Issuers should list the State Based Exchange-assigned Subscriber ID if applicable.				
03	303	Exchange-assigned Policy ID				Optional
		Purpose: The Policy ID Assigned by the Exchange for the policy for which CSR amounts are being reported. If this is an aggregated policy record, report the current Policy ID Number.				
04	304	Exchange-assigned Policy Start Date	Date	8	8	Optional
		Purpose: The Policy ID start date. First date the subscriber enrolled in this policy. This is the start date for the current Policy ID and may be different from the plan start date for this subscriber.				
05	305	Exchange-assigned Policy End Date	Date	8	8	Optional
		Purpose: The Policy ID end date. Last date the subscriber was enrolled in this policy.				
06	306	QHP Plan ID	Text	16	16	Mandatory
		Purpose: Enter the 16-digit HIOS generated qualified health plan identification number. This includes the 14-digit standard plan ID plus the 2-digit variant ID.				
07	307	Plan Benefit Start Date	Date	8	8	Mandatory
		Purpose: First date the subscriber was enrolled in this plan variation. If the issuer is filing more than one policy record for this subscriber, the start date may be different from the Policy Start Date.				
		Note: Format is MMDDYYYY.				
08	308	Plan Benefit End Date	Date	8	8	Mandatory
		Purpose: Last date the subscriber was enrolled in this plan variation.				
		Note: Format is MMDDYYYY.				
09	309	Total Monthly Premium	Numeric	4	12	Optional
		Purpose: The monthly premium amount for this policy for the applicable benefit year. If the policy changed to self-only or other than self-only during the benefit year, or if the monthly premium amount changed during the applicable benefit period as the result of other circumstances, enter the average monthly premium for this policy over the months in which it was in effect.				

CSR Reconciliation Business Validations for Issuer Summary and Policy Detail Records

Note: Business validations are separate from format validations. Issuers may receive format validation errors if data elements do not meet the format requirements defined above. Refer to the error code list for a complete list of possible error codes.

Business Validations for Data Elements in Issuer Summary Records (01)

ID #	Element Name	Business Validation	CMS Action if Validation Fails
1.	Record-Code	Values equal "01"	CMS will reject the file.
2.	Trading ID	Validate the TPID and HIOS ID association using FEPS reference data.	CMS will reject the file.
3.	Issuer State Code	N/A	N/A
4.	HIOS ID	N/A	N/A
5.	Issuer Extract Date	N/A	N/A
6.	Issuer Extract Time	N/A	N/A
7.	Benefit Year	Benefit Year will be 2020 or 2021.	CMS will reject the file.
8.	Total Actual CSR Amount	The Total Actual CSR Amount at the issuer level must match the sum of all CSR Provided at the policy level.	CMS will accept and process the file but send an error.
9.	Total CSR Amount Advanced To The Issuer By CMS	N/A	N/A
10.	Reconciliation Methodology	Starting in benefit year 2017, issuers must use the standard methodology solely. These fields are not case sensitive.	CMS will reject the file.
11.	Acquisition	The accepted values for this field are Y and N. These fields are not case sensitive.	CMS will accept and process the file but send an error.

12.	Acquisition Effective Dates	Acquisition Effective Date is required if there was an Acquisition (Acquisition set to Y).	CMS will accept and process the file but send an error.
13.	Acquiring Issuer	Issuers should list HIOS ID of the acquiring issuer. It is required if there was an Acquisition (Acquisition set to Y).	CMS will accept and process the file but send an error.
14.	Merger	The accepted values for this field are Y and N.	CMS will accept and process the file but send an error.
15.	Merger Issuer	Merger Issuers should be on the list of HIOS ID's that have been merged. It is required if there was a Merger (Merger set to Y).	CMS will accept and process the file but send an error.
16.	Merger Effective Dates	Merger Effective Date is required if there was a Merger (Merger set to Y).	CMS will accept and process the file but send an error.
17.	Technical POC First Name	N/A	N/A
18.	Technical POC Last Name	N/A	N/A
19.	Technical POC Email Address	N/A	N/A
20.	Technical POC Organization Title	N/A	N/A
21.	Technical POC Phone Number	N/A	N/A
22.	Business POC First Name	N/A	N/A
23.	Business POC Last Name	N/A	N/A
24.	Business POC Email Address	N/A	N/A
25.	Business POC Organization Title	N/A	N/A
26.	Business POC Phone Number	N/A	N/A

27.	Total Number Of CSR Variant Plans Per HIOS ID	The total number of plans submitted at the (03) Policy Detail Record should match the number of CSR variant plans per HIOS ID.	CMS will reject the file.
28.	Total Number of Exchange-assigned Subscriber IDs under this HIOS ID	The count of the number of Exchange-assigned Subscriber IDs in the (03) Policy Detail Records.	CMS will reject the file.

Business Validations for Data Elements in (03) Policy Detail Records

ID #	Element Name	Business Validation	CMS Action if Validation Fails
1.	Record-Code	Values equal "03"	CMS will reject the file.
2.	Exchange-assigned Subscriber Id	Validate against the FEPS enrollment data for Federally facilitated Exchange (FFE) individual market plans only.	CMS will accept and process the file but send an error. Note: If less than 50% of (03) Policy Detail Records have a valid Exchange-assigned Subscriber Id, CMS will reject the file.
3.	Exchange-assigned Policy ID	N/A	N/A
4.	Exchange-assigned Policy Start Date	N/A	N/A
5.	Exchange-assigned Policy End Date	N/A	N/A
6.	QHP ID	QHP ID should be a valid 16-digit HIOS ID plan identifier provided by the issuer for a specific coverage year.	CMS will reject the file.
7.	Plan Benefit Start Date	N/A	N/A
8.	Plan Benefit End Date	N/A	N/A
9.	Total Monthly Premium	N/A	N/A

10.	Total Allowed Costs For EHB	N/A	N/A
11.	Amount the Issuer Paid	N/A	N/A
12.	Amount the Enrollee(s) Paid	N/A	N/A
13.	Amount the enrollee(s) would have paid under the standard plan	N/A	N/A
14.	CSR provided	<p>The CSR Provided is the amount the enrollee(s) would have paid under the standard plan less the amount the enrollee(s) paid.</p> <p>The tolerance threshold for payment amount validation is less than \$1.</p>	CMS will reject the file.

Appendix A

1.1 Enterprise File Transfer (EFT) Location

CMS will only accept submissions through EFT.

For direct SFTP (for automation) - `sftp://eft.feeps.cms.gov`

- When using SFTP, send files using the “Inbound” folder.

The folder structure is applicable to both test and production. Differentiation is based on the .T or .P within the file name. **Note:** No file with a .T extension should include real production data. This filename is reserved for dummy/test data only. Issuers should not submit files with a .T extension during the actual submission window.

1.2 Error handling

For each data file an issuer submits to MIDAS, the issuer will receive a confirmation email indicating the status of the file (either Accepted and Processed, Accepted with Errors, or File Rejected) and a summary report in their outbound EFT folder. If the data submitted fails any of the business validations (see validations in tables above), an error report will be generated within the summary report and the issuer will receive a confirmation email indicating that the file has either been Accepted with Errors or Rejected. The file will be rejected if file format requirements are not followed, mandatory data elements are not included or are input incorrectly, or if (03) Policy Detail records over a certain threshold fail format and/or business validations. For a complete list of error codes and error code thresholds, see the Data File Error Code list posted separately on the CCIIO website.

1.3 Resubmission Process

1.3.1 Resubmissions by Issuers

CMS will consider every resubmission as a new submission. The name of the file must be unique. Every resubmission by issuers must have a new date and time in the file name. CMS will not accept or process resubmissions with identical dates and times in the file name. Each time an issuer resubmits, including for restatements, it must submit the entire file (i.e., the full pipe-delimited file). Because CMS will not process partial resubmissions, issuers should plan accordingly by saving their flat, pipe-delimited file in a separate environment so that it can be modified and resubmitted as necessary.

1.3.2 CSR Outreach Team

CMS will outreach to issuers if an issuer has not submitted an acceptable data and attestation file by the applicable submission deadline. The outreach team will provide coordination between CMS and contract partners. The files submitted by issuers and the files' statuses are communicated across stakeholders to identify any issues/errors in file submission to be resolved by issuers. The outreach team can be reached for questions and assistance at CSRreconquestions@cms.hhs.gov.

Appendix B

Email Messages to Issuers Regarding Status of Files

Scenario	Status	Email Message/Error Message
<p>CMS has accepted and processed the issuer’s file submission but still needs to confirm that attestation forms have been received and processed successfully. The data submission passed all CMS validations. Note: The issuer will not receive any validation errors in the scenario where they have submitted a file but have not submitted data specifically for one or more QHP IDs, so issuers should review the summary report in the EFT to determine if CMS has identified any QHP IDs for which data is missing.</p>	<p>Accepted and Processed</p>	<p>CMS has processed your CSR reconciliation data file submission. Your data file submission passed all CMS validation checks. Your data submission will be marked as complete contingent on your attestation(s) submission being accepted and processed successfully.</p> <p>You will receive a summary report in your EFT folder within the next 24 hours that includes your preliminary CSR reconciliation amount, which was calculated based on the data you have submitted to date. Please review the report. It will include any QHP IDs for which you have not submitted data, if applicable.</p>
<p>CMS has received and processed the issuer’s data file submission, but the file has errors.</p>	<p>FILE ACCEPTED BUT WITH ERRORS</p>	<p>CMS has processed your CSR reconciliation data file submission, but the file has errors. You will receive an error report in your EFT folder within the next 24 hours that summarizes the errors. Review the error report to determine if you need to correct the data, in which case you should resubmit the entire file to CMS.</p> <p>Additionally, the report includes your preliminary CSR reconciliation amount, which was calculated based on the data you have submitted to date. The report will also include any QHP IDs for which you have not submitted data, if applicable.</p>

Scenario	Status	Email Message/Error Message
<p>CMS has rejected the issuer's file submission due to data formatting or other critical error(s).</p>	<p>FILE REJECTED</p>	<p>CMS has rejected your CSR reconciliation file submission due to formatting or other critical errors. You will receive an error report in your EFT folder within the next 24 hours that summarizes the errors. Review the error report to determine what you need to correct, and then resubmit the entire file to CMS. All data resubmissions must include the required attestations in order for your submission to be considered complete.</p>
<p>Attestation form(s) has been accepted.</p>	<p>ATTESTATION FORM(S) ACCEPTED AND PROCESSED SUCCESSFULLY</p>	<p>CMS has received your CSR reconciliation attestation form(s) and it has been processed successfully. Your form(s) passed CMS's validation checks. Your submission will be marked as complete contingent on your data file being submitted and processed successfully (Accepted or Accepted with Errors).</p>
<p>Attestation form(s) has been rejected and need to be resubmitted</p>	<p>ATTESTATION FORM(S) HAS BEEN REJECTED</p>	<p>CMS rejected your attestation form(s) because it failed the validation process. Your attestation form(s) needs to be corrected and resubmitted. Below is a summary of the errors associated with your attestation form(s). Review the errors to determine what corrections need to be made, and then resubmit a corrected form(s).</p>

Scenario	Status	Email Message/Error Message
<u>Email Reminder</u>	REMINDER EMAIL TO ISSUERS WHO HAVE NOT SUBMITTED DATA/ATTESTATION FILES	CMS has not received your CSR reconciliation data file and/or attestation form(s). The due date for submission is June 25, 2021, at 11:59 p.m. Eastern Standard Time.