



# Automation Issues

*Working for America*

UNITED STATES OFFICE OF PERSONNEL MANAGEMENT



*United States of America*

## Reconciliation and the FEHB Clearinghouse

Finding and Resolving Discrepancies

Eric Figg





## Records Submitted

	2 <sup>ND</sup> Qtr 2002	3 <sup>RD</sup> Qtr 2002	4 <sup>TH</sup> Qtr 2002
CARRIERS	4,211,186	4,128,049	4,118,381
AGENCIES	3,875,439	3,999,774	3,990,281
DIFFERENCE	335,747	128,275	128,100



## Payroll Offices Not Submitting

- 23 payroll offices did not report data for the 4<sup>th</sup> quarter 2002
- 12 had previously reported data but did not this time
- 11 have never reported data



## Reported Previously But Not In 4<sup>th</sup> Quarter

• 1000 5698	Supreme Court	320	Yes
• 1101 9999	State—White House Office	1	?
• 1198 9999	State—Special Report for – Trade Negotiations	8	?
• 1205 0365	USDA Ag Ext Svc-Langston U	8	Yes
• 1601 0001	Dept of Labor	13,896	Yes
• 1900 9999	State—Retirements Accts Div	15,101	?



## Reported Previously But Not In 4<sup>th</sup> Qtr, continued

• 2420 9999	State—A.I.T. Consol. Payroll	74	?
• 3100 9999	State—National Reg Comm	1	?
• 5800 9999	State—FEMA	1	?
• 8000 9999	State—NASA	5	?
• 9505 0001	Legal Svcs Corp Comptr Ofc	10	Yes
• 9568 9999	State—Broadcasting B.O.G.	1,703	?



## Payroll Offices That Have Never Reported

- 0400 2222 GPO 2,638 Yes
- 1205 0302 USDA Ag Ext Svc- Alaska 0 No
- 1205 0331 USDA Ag Ext Svc- NM State U 58 Yes
- 1205 0362 USDA Ag Ext Svc- Alcorn St U 2 Unlikely
- XXXX XXXX NSA (2 payroll office numbers) ? No
- 4800 5201 State Justice Institute ? Yes
- 7400 5390 State—Amer Battle Monuments ? ?  
 – Commission, Paris Embassy



## Payroll Offices That Have Never Reported, continued

- XXXX XXXX CIA ? Yes
- 9900 4862 DC Govt—Disability-Crime Comp 408 Maybe
- 9900 4875 DC Govt—Water-Sewer Auth. 426 Yes



## Carriers Not Submitting

- Health Net of Pennsylvania 4,474 records
- Unicare HMO 7,212 records



## Adjusted Records For The 4<sup>th</sup> Qtr 2002

	Submitted to CLER	Expected But Not Received	Total Received and Expected
Carriers	4,118,381	11,686	4,130,067
Agencies	3,990,281	60,203	4,050,484
Difference	128,100		79,583



## Error Rate

	2 <sup>ND</sup> Qtr 2002	3 <sup>RD</sup> Qtr 2002	4 <sup>TH</sup> Qtr 2002
CARRIERS	15%	11%	10%
AGENCIES	14%	8%	6%



## Number Of Errors, continued

4 <sup>TH</sup> Qtr 2002	Records W/Errors	Fail Count = 3	Fail Count = 2	Fail Count = 1
CARRIERS	406,959	245,010 60.2%	36,098 8.9%	125,851 30.9%
AGENCIES	255,429	113,080 44.3%	55,599 21.7%	86,750 34.0%



## Error Reduction Goals

- OPM contract with the National Finance Center requires NFC to have 75% of the initially identified errors resolved after 7 quarters of CLER's operation.
- OPM expects 2 years to clean up errors built up over the years.



## Reduction of Originally Identified Errors

	# of Errors 2 <sup>nd</sup> Qtr 2002	# of Errors 4 <sup>th</sup> Qtr 2002 Fail Count = 3	% Reduction
Carriers	616,423	245,010	60%
Agencies	536,857	113,080	79%
Combined	1,153,280	358,090	69%



## Error Code 160

- Error Code 160 is when a carrier reports an enrollment but no agency reports the same enrollment
- Can be caused by:
  - person no longer working for the government
  - payroll office not submitting data to CLER
  - payroll offices not reporting seasonal employees who are currently in a non-pay status
  - carrier and agency both report the enrollment but use a different SSN



## Error Code 160, continued

- Error Code 160 records are not reported to the payroll offices –they did not report these to CLER
- 160 errors need to be brought to the attention of the payroll offices
- Carriers may do so directly or ask NFC for assistance. Call **504-255-3270**.



## Family vs Self Only Problem

- Entering a Family enrollment into your database as a single enrollment (due to a lack of dependent data) and then reporting a single enrollment to CLER automatically sets up discrepancies.



## Problem With Pseudo SSNs

- Agencies are not able to report any alternate SSN to CLER.
- OPM suggests that carriers report the actual SSN to CLER, if they know it.



## Enhancement to CLER

Beginning June 1, agencies will be able to view a limited amount of data that the carriers have reported to CLER. This will assist the agencies in determining the reasons for discrepancies and better allow them to resolve the discrepancies.



## Assistance from ORP

- Carrier Information System (CIS): 478-757-3164
- Carrier Help Desk: 202-606-5149



## Electronic Enrollment

- USPS will be electronic by the next Open Season.
- HIPAA compliance will help processing.



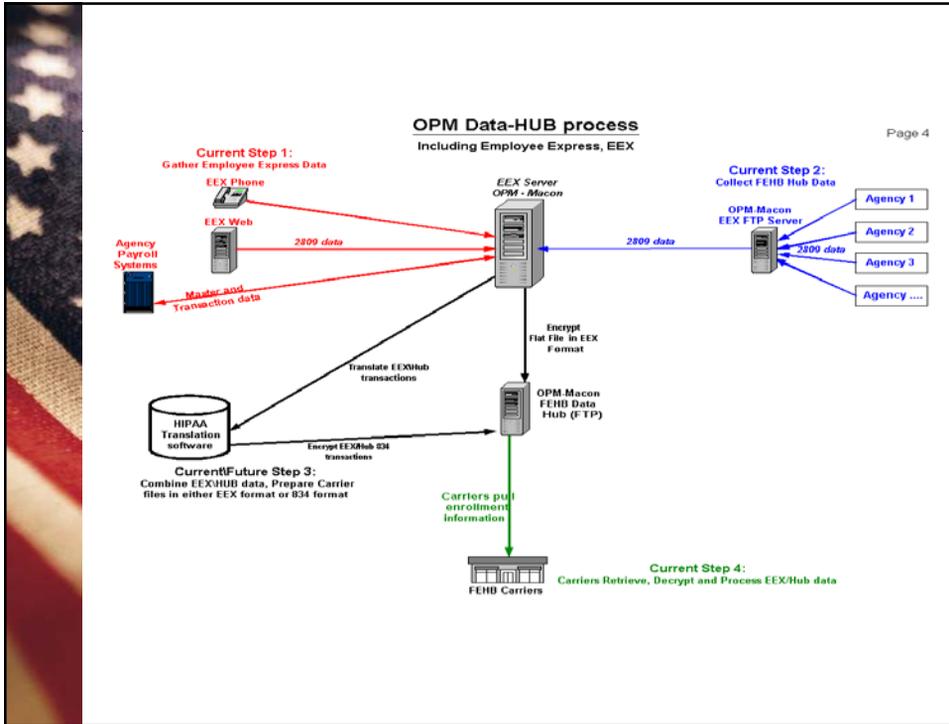
*United States of America*

## OPM FEHB Data-HUB

Electronic FEHB Enrollments

Rhonda Wood

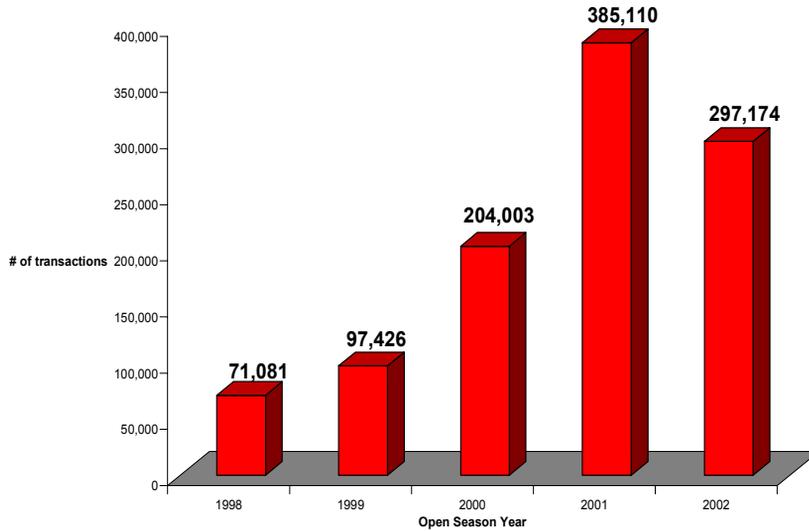




## OPM FEHB Data-HUB Open Season 2002

	<u>Users</u>	<u>Transactions</u>
• Annuitant Open Season Express (NCS)	1,800,000	93,939
• Department of Defense FEHBP Demonstration Project (Iowa Foundation)	4,483	2,555
• Department of Defense (Randolph AFB)	605,520	74,996
• Department of Interior	155,400	15,641
• Department of Labor	15,800	1,207
• Department of Veterans Affairs	218,032	31,064
• Employee Express	953,155	77,523
• National Imagery & Mapping Agency	7,000	249
<b>Total</b>	<b>3,759,510</b>	<b>297,174</b>

## FEHB Data-HUB Open Season Total Transactions



## OPM FEHB Data-HUB Total Transactions

January - December 2002

**350,028 transactions**





## Open Season 2003- New Agencies

- **Employee Express**
  - Department of Veterans Affairs
  - Government Printing Office
- **US Postal Service**



## Health Insurance Portability and Accountability Act (HIPAA)

- **Data translation (SF2809 to 834 transaction set)**
  - Gap Analysis
  - Trading Partner Agreement
  - HIPAA Workgroup
  - Translator
- **Proposed Test Plan**
  - Phase I Test translator internally - **March**
  - Phase II Test with limited number of carriers - **April**
  - Phase III 3<sup>rd</sup> Party Certification - **May**
  - Phase IV Test Employee Express and Data-Hub Agencies transactions with all Carriers - **July through September**

## HIPAA Data Issues

- Split out name fields to Last, First, Middle Initial
- Capture 'Other Insurance' data for employee as well as for each dependent
- Capture dependent's address for each dependent
- Country Code required for foreign addresses
- **Dependent Relationship Codes Changes**

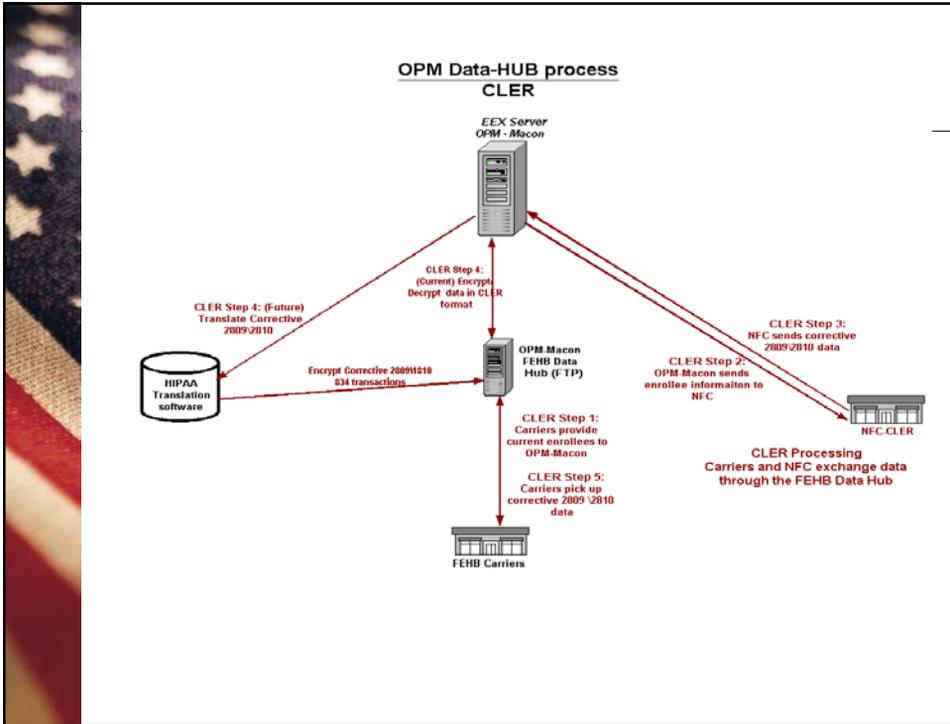
Self	Foster Child
Spouse	Stepson or Stepdaughter
Child	Adopted Child
Unmarried disabled child over age 22 incapable of self-support	

## OPM-FEHB Data-HUB

### Centralized Enrollment Clearinghouse (CLER)



- Carrier sends full Enrollment file
- CLER Corrective Action 2809's to Carriers  
- 282 records processed in 2002
- CLER Corrective Action 2810's to Carriers  
- 120 records processed in 2002



# Health Insurance Portability and Accountability Act (HIPAA)

HIPAA, HIPAA, Hooray

Laurie Bodenheimer  
Jay Fritz



## HIPAA and FEHB

- Law and regulations define FEHB Program as a health plan
- We will comply with HIPAA regulations
  - Transactions and Code Sets
  - Privacy
  - Security
- OPM/Carrier workgroups set up for Transactions and Privacy



## Transactions

- Enrollment files picked up from OPM-Macon will be in HIPAA-compliant (ASC X12N 834) format by 10/16/03
- Corrective Action files from FEHB Clearinghouse will also be in 834 format
- Plan submissions to FEHB Clearinghouse will be in proprietary format - **not** ASC X12N 271
- Premium payments will **not** be in ASC X12N 820 format



## Transactions Workgroup

- Meeting since February 2002
- OPM contract with Axiom Systems to create translator
- Finishing gap analysis and mapping for EEX/data-HUB 2809, CLER 2809, CLER 2810 and SF 2810
- Working on ORP and NFC becoming data-HUB users



## Transactions Workgroup continued

- Developing Trading Partner Agreement (Companion Document)
- Working to resolve outstanding issues



## Gap Analysis and Mapping

- Group concentrating on EEX/Data-HUB 2809, CLER 2809 and CLER 2810
- Also accounting for ORP and NFC policies and procedures
- Draft mapping sent to Axiom, will finalize at next workgroup meeting



## Issues resolved

- Won't send non-compliant "bad" transmissions. Transactions will be sent back to HUB agency. OPM-Macon won't edit any transactions
- Information sent electronically may not match information gathered on paper SF 2809 or SF 2810
- Sponsor ID field will use agencies' Taxpayer ID # (cross-walked from payroll office number)



## Issues resolved continued

- CLER corrective action 2809s won't include address data for family members
- CLER corrective action 2809s won't include "Other Insurance" information



## Issues still working on...

- Identification of SF 2809/SF 2810 transmissions
- Certification of OPM-Macon as a Clearinghouse and validation of transmissions
- Mapping "remarks" used on paper SF 2809 and SF 2810



## Privacy and FEHB: Ground Rules

### **The FEHB Program is a CE**

- Insurance Services Program (part of Division for HR Products and Services) represents the FEHB Program, and falls under the Rule
- We continue to evaluate Privacy rule to determine possible impact on other parts of OPM

### **HIPAA cannot supercede FEHB law/regulations**



## FEHB Privacy Workgroup

- Began meeting in February 2002 to explore impact of Privacy Rule on FEHB
- Goals:
  - Share knowledge
  - Develop best practices
  - Share information with all Plans
- Identified issues, subgroups researched and brought feedback to the larger workgroup



## HIPAA Privacy

**We cannot tell you how  
to implement HIPAA  
privacy**



## HIPAA Privacy continued

- We are not administrators or enforcers of a DHHS rule.
- All FEHB plans are CEs in their own right, and directly responsible for complying with privacy regs. **You must do what you think is right.**
- We won't mandate or request FEHB Program-wide consistency.



## Plan Notices of Privacy Practices

- Each FEHB plan is a CE
- You are responsible for issuing your NPP to all your members, including Federal enrollees
- Do not send your NPPs to OPM. We will not approve, nor keep on file.



## Business Associate Agreements

How do we deal with:

- Disputed claims
- Other customer service issues
- FEHB Clearinghouse



## Business Associate Agreements

### BA Agreements for Disputed Claims

- We are both CEs
- We consider disputed claim process to be payment-related
- OPM has certain responsibilities under FEHBA and FEHB regulations that cannot be superceded by HIPAA
- Disputed claim reviewed only upon the members' written request, in accordance with FEHBA



## Business Associate Agreements continued

### Other Customer Service Issues

- We are both CEs
- Member requests our assistance to resolve customer service issue with you– generally health care operations or payment related
- OPM has certain responsibilities/obligations under FEHBA and FEHB regulations that cannot be superceded by HIPAA



## Business Associate Agreements continued

- BA Agreements for CLER
  - Not necessary. Since NFC is OPM's contractor to administer CLER, carriers are releasing information to OPM.
  - While Reconciliation is not a covered transaction, can be seen as part of health care operations. Therefore, two CEs can release PHI to each other without member consent
  - Privacy Act involvement. For CLER to be compliant with the Privacy Act, NFC must be performing the reconciliation function on behalf of OPM.
  - BA agreement between NFC and OPM will suffice.



## OPM Contacts

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Questions???

