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## 2020 Optional Benefit Year Cost-sharing Reduction (CSR) Data Submission

**Q:** Will the Centers for Medicare & Medicaid Services (CMS) permit issuers to submit CSR data for the 2020 benefit year?

**A:** Yes. CMS will provide an opportunity for all issuers to submit 2020 benefit year CSR data. Under 45 CFR 156.410, QHP issuers must ensure that any individual enrolled through the Exchange, who is eligible for CSRs, pays only the cost sharing required for the applicable covered service under the plan variation. Issuers will also be allowed to submit 2019 benefit year restatement data, except for those issuers who have had, whether by stipulation or otherwise, a 2019 benefit year CSR judgment entered in their favor by the Court of Federal Claims. CMS will not accept restated 2019 data from those issuers. The submission window for both benefit years will be from April 26, 2021 to June 25, 2021. Similar to the reporting timeline for previous years' CSR reconciliation cycles, issuers submitting data in this submission window can expect to receive their CSR reconciliation reports within the month following the close of the submission window.

**Q:** Where can issuers find more information on how to complete the CSR data submission and restatement processes?

**A:** The optional CSR data submission process will be similar to the process for prior years' CSR reconciliation cycles. CMS will hold a webinar on April 26, 2021 for all issuers. This webinar will provide an overview of the CSR data submission process, timelines, system processing, data file structure, data file submission process, and the attestation process. Issuers can register for this webinar through <https://www.regtap.info/>.

As required by 45 CFR 156.430, issuers may *only use the standard methodology* when submitting 2020 benefit year files and 2019 benefit year restatement files, if issuers elect to submit either one of these files.

CMS intends to release updated technical data file and attestation file specifications prior to the beginning of the data submission period at: <https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance#Premium-Stabilization-Programs>.

CMS has previously released technical data file and attestation file specifications, available on the CCIIO website at: <https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/Document-1-CSR-Issuer-MIDAS-Inbound-Spec-033120-5CR-040120.pdf> and <https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/Document-2-CSR-Reconciliation-Issuer-to-MIDAS-Attestation-Inbound-Specification-032520.pdf>. Issuers should note that

there will be no file structure changes from last year's data submission window to this year's, except for the benefit year.

From a technical or operational standpoint, there are no significant changes from the way issuers submitted data and attestation files from past years. Issuers can refer back to the *Manual for Reconciliation of the Cost-Sharing Reduction Component of Advance Payments for Benefit Year 2017* at: <https://www.cms.gov/CCIIO/Resources/Forms-Reports-and-Other-Resources/Downloads/Final-CSR-Reconciliation-Guidance-BY2017.pdf>.

For any questions, please email [CSRreconquestions@cms.hhs.gov](mailto:CSRreconquestions@cms.hhs.gov).

**Q:** Is there anything I need to do to participate in this process? How will I receive communications from HHS related to this process?

**A:** Issuers that have participated in the past will need to complete the data and attestation files just like in prior years. Also, please refer to your benefit year 2019 submissions to see who your CSR data submission contacts were during the 2019 benefit year and email [CSRreconquestions@cms.hhs.gov](mailto:CSRreconquestions@cms.hhs.gov), as soon as possible, if your technical or business points of contact have changed since the benefit year 2019 process. Additionally, new issuers should email [CSRreconquestions@cms.hhs.gov](mailto:CSRreconquestions@cms.hhs.gov) to update their respective points of contact if the correct individuals did not receive this REGTAP announcement.

Issuers that are new to this process should email the CMS Level I Helpdesk at [CMS FEPS@cms.hhs.gov](mailto:CMS_FEPS@cms.hhs.gov) to ensure they have access to Electronic File Transfer (EFT), through which issuers submit CSR reconciliation data. Issuers may also need to fill out the latest Electronic Data Interchange (EDI) registration form through this link: <https://zone.cms.gov/document/edi-onboarding-form-and-instructions-connectivity-testing>. Additionally, please email [CSRreconquestions@cms.hhs.gov](mailto:CSRreconquestions@cms.hhs.gov) to identify yourself as a new participant.

Lastly, issuers are welcome to email [CSRreconquestions@cms.hhs.gov](mailto:CSRreconquestions@cms.hhs.gov) with a general email address, in addition to your specific points of contact, to ensure that CMS will always be able to communicate with you in future years in case of staff turnover.