2015 Form 1095-A Distribution Process Primer

Form 1095-A is required by federal law for all Minnesotans who purchased a Qualified Health Plan (QHP) through MNsure in 2015. Because MNsure and the Office of MN.IT Services (MN.IT) share responsibility for the generation and distribution of 1095-A forms, we are responding to your inquiry jointly.

First, the distribution process for 1095-A forms is intended to work effectively when an individual enrolls in QHP coverage and effectuates – the process by which MNsure and insurance carriers exchange data indicating coverage based on enrollment processing and premium payment. Due to the vast amount of data involved in this process, MNsure and carriers must reconcile enrollment data throughout the year. As MN.IT and MNsure leadership have shared publicly, current delays and difficulty in generating and distributing 1095-A forms to Minnesotans is primarily the result of not finishing the enrollment data reconciliation work identified for completion in the 2015 IT Roadmap. This project, as reflected in the 2016 IT Roadmap, is planned for completion this summer and will prevent future 1095-A form distribution delays.

Second, the primary IT systems involved in this process include vendors IBM/Curam and Connecture, MN.IT's Enrollment System of Record (ESOR) and individual carriers' IT systems. MNsure, MN.IT and carriers worked on the electronic exchange of enrollment data throughout 2015, starting preparatory work on the process to reconcile enrollment data in hopes of avoiding the cumbersome manual 1095-A process that occurred in 2015. As a result of this effort, IT systems supporting data exchange were developed, tested and refined. However, agreement on process development, data format and coordination of work across MNsure and carrier IT systems required more time and resources than anticipated. During the 2016 open enrollment period, MNsure and MN.IT prioritized daily transmission of electronic enrollment files to carriers, with added emphasis on data accuracy, which also furthered delayed full data reconciliation work.

Finally, MN.IT and MNsure staff continue to work together on review and refinement of all carrier enrollment files received in 2015, correcting and updating that data as needed to ensure it loads correctly into the enrollment data base as needed to generate automated 1095-A forms. For those data records identified as more complicated and requiring further evaluation, a manual process has been established and additional staff resources dedicated to this work.