

Allowable Data Changes, Essential Community Providers (ECP) & Stand-alone Dental Plans (SADP) ECP Tool

May 23, 2018



Center for Consumer Information and
Insurance Oversight (CCIIO)

Agenda

- Session Guidelines
- Qualified Health Plan (QHP) Timeline Reminders
- Allowable Data Changes
- Essential Community Providers (ECP) & SADP ECP Tool
- Closing Remarks

Intended Audience

- Please be advised that this is not an open press call.
- Members of the press or a media outlet should disconnect the call at this time and contact the Centers for Medicare & Medicaid Services (CMS) Press Office for further information.

Session Guidelines

- This is a 45-minute webinar session.
- Throughout the webinar, you may submit questions via the Q&A Panel.
- We will address questions during the Q&A session at the end of the presentation.
- For questions regarding content or logistics, contact the Registration for Technical Assistance Portal (REGTAP) Registrar at registrar@regtap.info or (800) 257-9520.

Upcoming Plan Year 2019

Key Dates for Qualified Health Plan (QHP) Certification

Date	Category	Activity
May 1 – May 31, 2018	PM Community	Issuers and States provide Usernames for and Request Access to PM Community
May 9, 2018	QHP Certification	PY19 Submission Window Opens
May 31, 2018	QHP Certification	Deadline for Issuers to Submit Templates for the PY19 Early Bird Review Round
May 9 – May 31, 2018	PM Community	Issuers and States Log into PM Community to view PY19 Issuer Details and Plan Lists

QHP Timeline Reminders

Overview

- The timeline described in this presentation apply to states in the Federally-facilitated Exchanges (FFE), states performing plan management functions, and State-based Exchanges on the Federal platform (SBE-FPs).
- Issuers in SBE-FPs are not required to submit service area data change requests. SBE-FPs should work with their issuers on any data changes guidance.

Initial Submission Deadline

- Issuers applying for QHP (including SADP) certification must submit complete and accurate QHP Applications by **June 20, 2018**.
 - For PY19, a complete and accurate QHP Application for the initial submission deadline is a QHP Application containing all necessary templates, excluding a Rates Table Template or Unified Rate Review Template (URRT).
- QHP Applications for new plans CMS receives after this date and plans for which significant changes to the initial submission are submitted after this date without prior CMS and state approval may not be considered for certification.

Rates Table Template & Unified Rate Review Template (URRT) Deadline

- Issuers applying for QHP certification will submit complete and accurate Rates Table Template(s) and URRT by **July 25, 2018**.
- SADP issuers do not submit a URRT. Issues applying for SADP certification will submit complete and accurate Rates Table Template(s) by July 25, 2018.
- Issuers that submit an initial QHP Application by June 20, 2018, but do not submit a Rates Table Template(s) and URRT by July 25, 2018 may not be considered for certification.

QHP Certification Timeline: Submission & Review

Activity	Dates
Initial QHP Application submission window	5/9/18 - 6/20/18
Initial QHP Application deadline	6/20/18
Initial deadline for QHP Application Rates Table Template	7/25/18
CMS reviews initial QHP Applications as of 6/20/18	6/21/18 - 8/3/18
CMS releases first correction notice	8/10/18
Service area data change request deadline	8/13/18
Deadline for issuers to change QHP Applications	8/22/18
CMS reviews QHP Applications as of 8/22/18	8/23/18 - 9/10/18

QHP Certification Timeline: QHP Agreement and Plan Confirmation

Activity	Dates
CMS posts QHP agreements and QHP plan lists	9/17/18
CMS sends final correction notice to issuers	9/17/18
Limited data correction window issuer data submission	9/20/18 - 9/21/18
Issuers send signed agreements, confirmed plan lists, and final plan crosswalk list to CMS	9/17/18 - 9/25/18
State sends CMS final plan recommendations	9/25/18
CMS sends certification notice to issuers	10/4/18 - 10/5/18
Open enrollment begins	11/1/18

Plan Transfers

- States performing plan management and SBE-FPs can transfer issuer data anytime between 5/9 and 8/22.
- CMS encourages frequent transfers so issuers can always see their most recent data on plan preview.
- Approval from CMS or notification to CMS is not required.

Allowable Data Changes

Key Dates for QHP Data Changes

Activity	Allowed Changes	Date
Initial Application Submission	• Issuers will submit QHP Applications for 2018 QHPs and SADPs they are seeking to certify for 2019 as well as new 2019 QHPs and SADPs. • Issuers may make any changes to their data without state or CMS authorization.	5/9/18-6/20/18
QHP Review and Modification	• No new plans may be submitted. • Issuers may not change plan type. Child-only value cannot be changed for QHPs (excluding SADPs). • Data change requests to CMS are required for changes to service area. Issuers must submit requests by 8/13/18. • Issuers may submit plan withdrawal requests. • For all other changes, issuers are not required to submit data change requests or document state authorization to CMS. CMS will monitor all data changes and contact issuers with any concerns about changes made.	6/21/18-8/22/18

Key Dates for QHP Data Changes (continued)

Activity	Allowed Changes	Date
Data changes after QHP Application Deadline	• Issuers will only make corrections directed and approved by CMS or their state.	8/23/18-10/5/18
After Final Data Submission	• No further data changes allowed prior to certification. • Issuers will have a final opportunity to withdraw plans during the plan confirmation process. • CMS may allow issuers to make critical post-certification data corrections in order to correct data display errors on HealthCare.gov and to align QHP display with products and plans approved by the state. • Post-certification data corrections require data change requests and state and CMS approval. Allowed changes will occur during periodic, scheduled limited data correction windows.	10/6/18-onward

QHP Review and Modification

- Except for adding plan, changing plan type or child-only value, or changing service area, issuers can make changes as needed between June 21 and August 22, 2018. Issuers are not required to ask permission from CMS.
- CMS reviews all changes made and will contact issuers if further information is needed.
- Issuers should always seek state permission before making changes. Issuers are not required to document state approval.

Service Area Changes

- Issuers who have submitted a QHP Application can request permission to make changes to their service area by submitting a service area data change request.
- Requests are sometimes also called 'petitions'.
- This process applies to all issuers in the FFE, including issuers in states performing plan management functions.
- **Service area data change requests are due by August 13, 2018.**

What is a Service Area Data Change Request?

Examples of Service Area changes:

- Changes to the Service Area Template
 - Changing the counties or zip codes in a service area (including from or to a partial county)
 - Moving a county from one service area to another
 - Changing the name of a service area
 - Removing or adding a service area
- Changes to the Plans and Benefits Template
 - Changing a plan's service area

Plan Withdrawals

- Issuers may withdraw plans without requesting a service area change.
- CMS encourages issuers to only submit plans for QHP certification that it intends to offer for consumers.
- Additional information on requesting plan withdrawals is available on the QHP certification website.

Required Elements of a Request

- Data Change Request Worksheet
- Supplement B to the Data Change Request Worksheet
- State approval

ECP & SADP ECP Tool

Summary of ECP/NA Template

- The ECP/Network Adequacy Template gives users the ability to link each provider (ECP or Network Adequacy) with the network with which it is associated.
- PY19 updates include:
 - Updated template header for PY19
 - Updated the supported versions of Microsoft Excel
 - Updated ECP reference data to Final for PY19

ECP/NA Template Version 8.2

The ECP/Network Adequacy Template has been updated to Version 8.2 for PY19

2019 ECP/Network Adequacy Template v8.2
User Control & Details for Template

Issuer Information

Issuer ID: *	
Source System: *	
State: *	
Alternate ECP Standard: *	No

Actions

1. Create New Provider Tab
Please enter all **Issuer Information** above before creating a new tab.

A. New Individual Provider (MD/DO)
Create Individual (MD/DO) Tab

B. New Facility, Pharmacy, Non-MD/DO
Create Facility, Pharmacy, Non-MD/DO Tab

2. Import Network IDs
Click the Import Network IDs button to import a list from the Network ID template.
Import Network IDs

3. Validate Data
Click the Validate Data button to validate the data. **Warning:** Depending on data size, validation may take several minutes.
Validate

4. Create Supporting Documents
Perform data validation & export data to XML files.
Create Documents

5. Delete an Existing Tab?
Refer to Column P on this tab if you would like to delete an existing tab.

Notes & Instructions

1. Enter all **Issuer Information**, then create a new tab using the buttons below to enter data

2. Ensure automatic calculation is turned on. Formulas -> Calculation Options -> Automatic

3. Data can be entered manually or Copy & Pasted into each tab

4. All fields with an asterisk (*) are required

5. Validate data (using the "Validate" button below) after entering in all information

Exporting Data:

1. Data must pass all validation checks before being exported. Any invalid entries will be displayed in the 'Errors' tab and must be corrected.

2. Click "Create Documents" to export data from all provider tabs.

3. When prompted, select the folder in which you wish to save the files.

4. All files will be saved as XML files.

Warning: Files larger than 50mb cannot be uploaded to HICIS/SEIFF. Please ensure that each exported XML file is less than 50mb. On average, tabs with less than 100,000 records should be okay.

Validation Status
Incomplete

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System Requirements

For PY19, the ECP/NA Template has been updated to work with Microsoft Excel 2013 and 2016.

Browser Requirements

- Internet Explorer 11
- Firefox 56.0

Excel Requirements

- Microsoft 2013
- Microsoft 2016

Using the ECP/NA Template

Navigate to the **Select ECPs tab** to view the Final PY19 Essential Community Providers List. The list can be filtered by each field (e.g., filter to include only providers from the applicable state).



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Populating ECPs

Double click on an ECP row to select it. Click the **Insert Selected ECPs** button to populate the ECP into either the Facility ECPs or Individual ECPs tab.

Show All ECPs Clear All Show Selected ECPs Insert Selected ECPs							
Add ECP?	Row Number	Site Name	Organization Name	National Provider Identifier	ECP Category (General ECP Standard Issuers Only)	Number of Medical FTEs or Bed Count	Number of Dental FTEs
ADD	201800002	Adak Medical Clinic	EASTERN ALEUTIAN TRIBES, II	1285796094	Community Mental Health Centers, Dental	8	1
	201800003	Akhiok Village Clinic	KODIAK AREA NATIVE ASSOCI	1205883907	Dental Providers, Federally Qualified Healt	1	1
	201800004	Yukon-Kuskokwim Health Corpor	Yukon-Kuskokwim Health Corpor	1447477815	Indian Health Service, Other ECP Provider	1	0
	201800005	Yukon-Kuskokwim Health Corpor	Yukon-Kuskokwim Health Corpor	1447477815	Indian Health Service, Other ECP Provider	1	0
	201800006	ANESIA KUDRIN MEMORIAL CL	Eastern Aleutian Tribes, Inc.	1558423392	Community Mental Health Centers, Dental	1	1
	201800007	Yukon-Kuskokwim Health Corpor	YUKON-KUSKOKWIM HEALTH	1447477815	Indian Health Service, Other ECP Provider	1	0
	201800008	ALLAKAKET HEALTH CLINIC	Tanana Chiefs Conference (DEN	1821201278	Community Mental Health Centers, Dental	0.2	0.02
	201800009	SVT Health & Wellness	SELDOVIA VILLAGE TRIBE	1336178847	Federally Qualified Health Centers	1	0
	201800010	Quyana Club House	Southcentral Foundation	1144274986	Other ECP Providers, Tribal Health Progra	0.9	0
	201800011	Pediatric Cardiology of Alaska	Pediatric Cardiology of Alaska	1528203551	Other ECP Providers	2	0

Select ECPs Tab Buttons

There are four buttons on the Select ECPs tab:

- **Show All ECPs** clears all filters to show the original list
- **Clear All** unselects all ECPs (so that no rows are highlighted)
- **Show Selected ECPs** filters the list to include only selected ECPs (so that only highlighted rows are shown)
- **Insert Selected ECPs** populates ECPs into the Facility ECPs and Individual ECPs tabs

	A	B	C	D	E	F	G	H
1		Show All ECPs		Clear All		Show Selected ECPs	Insert Selected ECPs	
2	Add ECP?	Flow Number	Site Name	Organization Name	National Provider Identifier	ECP Category (General ECP Standard Issuers Only)	Number of Medical FTEs or Bed Count	Number of Dental FTEs
3		201800002	Adak Medical Clinic	EASTERN ALEUTIAN TRIBES, II	1285796094	Community Mental Health Centers, Dental	8	1
4		201800003	Akhiok Village Clinic	KODIAK AREA NATIVE ASSOCI	1205883907	Dental Providers, Federally Qualified Health	1	1
5		201800004	Yukon-Kuskokwim Health Corpor	Yukon-Kuskokwim Health Corpor	1447477815	Indian Health Service, Other ECP Provider	1	0

ECP Population Logic

ECPs in the 'Select ECPs' tab will populate based on the total number of Full-time Equivalent (FTEs) (Medical and Dental) or hospital beds.

- If the total number of FTEs for a selected provider is 0-1, then the ECP will populate as an Individual ECP
- If the total number of FTEs or hospital beds for a selected provider is greater than 1, then the ECP will populate as a Facility ECP

National Provider Identifier	ECP Category (General ECP Standard Issuers Only)	Number of Medical FTEs or Bed Count	Number of Dental FTEs	
1225228729	Federally Qualified Health Centers, Indian H	1	0	Individual
1821201278	Community Mental Health Centers, Dental F	2	0.05	
1851662233	Federally Qualified Health Centers	1.4	0	Facility
1306987532	Community Mental Health Centers, Dental F	6	1	
1609871391	Federally Qualified Health Centers	3	0	
1194886895	Community Mental Health Centers, Dental F	0.04	0.02	Individual

Completing ECP Tabs

After populating ECPs, complete all remaining blank fields in the Facility ECPs and Individual ECPs tabs (i.e., Facility and Specialty Types, Network IDs, FTEs or Bed Count)

	A	B	C	D	E	F
1			Select All	Clear All	Remove Selected ECPs and Blank Rows	
2	Remove ECP?	Row Number	National Provider Identifier (NPI)*	Facility Name*	Facility Type*	Provider Name*
3		201800002	1285796094	EASTERN ALEUTIAN TRIBES, INC. (EAT)	000 OTHER	Adak Medical Clinic

FTE and Bed Count Reminders

- In both the “Individual ECPs” and “Facility ECPs” tabs:
 - The field “Number of Medical FTEs or Bed Count” reflects the number of contracted MDs, DOs, PAs, and NPs or staffed hospital beds at the respective ECP facility and must be no greater than the number reported by the provider as reflected on the “Select ECPs” tab
 - The field “Number of Dental FTEs” reflects the number of contracted DMDs and DDSs at the respective ECP facility and must be no greater than the number reported by the provider as reflected on the “Select ECPs” tab

Facility ECPs and Individual ECPs Tabs – Removing Blank Rows

Blank rows can be removed from the Facility ECPs and Individual ECPs tabs by clicking the 'Remove Selected ECPs and Blank Rows' button.

		Select All	Clear All	Remove Selected ECPs and Blank Rows	
Remove ECP?	Row Number	National Provider Identifier (NPI)*	Facility Name*	Facility Type*	
	201000002	1205796094	EASTERN ALUTIAN TRIBES, INC. (EAT)	000 OTHER	
REMOVE	201800003	1205883907	KODIAK AREA NATIVE ASSOCIATION (KANA)	000 OTHER	

Facility ECPs and Individual ECPs Tabs – Buttons

The Facility ECPs and Individual ECPs Tabs have the following buttons:

- **Select All** selects each populated row (highlights all rows)
- **Clear All** unselects each populated row (un-highlights all rows)
- **Remove Selected ECPs and Blank Rows** removes highlighted rows and blank rows

		Select All	Clear All	Remove Selected ECPs and Blank Rows
Remove ECP?	Row Number	National Provider Identifier (NPI)*	Facility Name*	Facility Type*
	201800002	1285796094	EASTERN ALEUTIAN TRIBES, INC. (EAT)	000 OTHER

Network Adequacy Tabs

In order to populate Network Adequacy tabs, click the **Create Individual (MD/DO) Tab** and **Create Facility, Pharmacy, Non-MD/DO Tab** buttons on the User Control tab.

2019 ECP/Network Adequacy Template v8.2
User Control & Details for Template

Issuer Information	
Issuer ID: *	
Source System: *	
State: *	
Is this an Alternate ECP Standard? *	No

Notes & Instructions

1. Enter all **Issuer Information**, then create a new tab using the buttons below to enter data
2. Ensure automatic calculation is turned on. Formulas -> Calculation Options -> Automatic
3. Data can be entered manually or Copy & Pasted into each tab
4. All fields with an asterisk (*) are required
5. Validate data (using the "Validate" button below) after entering in all information

Exporting Data:

1. Data must pass all validation checks before being exported. Any invalid entries will be displayed in the "Errors" tab and must be corrected.
2. Click "Create Documents" to export data from all provider tabs.
3. When prompted, select the folder in which you wish to save the files.
4. All files will be saved as XML files.

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Validation Status

Incomplete

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Create Individual (MD/DO) Tab
B. New Facility, Pharmacy, Non-MD/DO
Create Facility, Pharmacy, Non-MD/DO Tab
2. **Import Network IDs**
Click the Import Network IDs button to import a list from the Network ID template.
Import Network IDs
3. **Validate Data**
Depending on data size, validation may take several minutes.
Validate
4. **Create Supporting Document**
Perform data validation & export data to XML files.
Create Documents
5. **Delete an Existing Tab?**
Refer to Column P on this tab if you would like to delete an existing tab.

Finalizing Template

After entering data, click the **Validate** button to confirm that the data have no data validation errors.

Then click the **Create Documents** button to generate a zip file that will later be uploaded as part of data submission.

2019 ECP/Network Adequacy Template v8.2
User Control & Details for Template

Issuer Information	
Issuer ID: *	
Source System: *	
State: *	
Alternate ECP Standard	No

Notes & Instructions

1. Enter all **Issuer Information**, then create a new tab using the buttons below to enter data
2. Ensure automatic calculation is turned on. Formulas -> Calculation Options -> Automatic
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Errors Tab

The **Errors Tab** lists any errors that were found as part of validations after clicking the **Validate** or **Create Documents** buttons.

A B C		
Below are the validation errors that were identified in the submitted data. Please correct these errors. You must have a valid template before you can export data to XML files. Select the Cell address that is underlined and highlighted in blue to navigate to the specified error.		
Important Note: If one or more rows are deleted in a provider tab or data is reorganized, cell hyperlinks in that tab may no longer be accurate. Please re-run the data validation on the 'User Control' tab to refresh the hyperlinks if this occurs.		
1		
2	Tab	Cell
3	Facility ECPs	\$KS3
4	Facility ECPs	\$NS3
5	Facility ECPs	\$OS3

ECP Write-in Reminders

- The ECP write-in process will continue to be available to issuers for counting toward the issuer's satisfaction of the 20 percent ECP standard only for the issuer that:
 - Selects the provider from the HHS Available ECP Write-in List for PY19; and
 - Writes in the provider on its ECP write-in worksheet by no later than August 22, 2018

Refresher on ECP Tools for PY19 QHP and SADP Reviews

Benefits of Using the ECP Review Tool

- Speeds up reviews
 - Example: Provides the ability to review a large volume of submitted ECPs to identify service areas that do not meet the 20 percent ECP standard.
- Quick and efficient way to identify concerns that may not easily be found through hands-on ECP review.
 - Example: Identifies any ECPs that fall outside of the issuer's service area.
- Allows for easier comparison of contracted ECPs across the ECP categories.
 - Example: Identifies ECP categories for which an issuer has not yet contracted to satisfy the ECP category per county contract offering requirement

Benefits of Using the ECP Review Tool (continued)

- Includes allowable ECP write-ins to count toward an issuer's satisfaction of the 20 percent ECP standard only for the issuer that writes in the ECP on its ECP write-in worksheet.
 - Available write-in providers are those that appear on the Department of Health and Human Services (HHS) Available ECP Write-in List for PY19 by having submitted an ECP petition to HHS no later than the deadline for issuer submission of changes to the QHP application.
 - The “Available ECP Write-in List” appears as a tab within the tools so that ECPs on an issuer's ECP Write-in Worksheet can be imported into the tools and counted toward satisfaction of the 20 percent ECP standard.

Live Demo

- QHP(medical) ECP Tool
- Stand-alone Dental Plan (SADP) ECP Tool

Deficiencies and Justifications

- As in previous years, if an issuer's application does not satisfy the ECP standard, the issuer would be required to include as part of its application for QHP certification a satisfactory narrative justification describing how the issuer's provider networks, as presently constituted,
 - Provide an adequate level of service for low-income and medically underserved individuals
 - How the issuer plans to increase ECP participation in its provider networks in future years
- At a minimum, a narrative justification would include:
 - Number of contracts offered to ECPs for the 2019 plan year
 - Number of additional contracts an issuer expects to offer and the timeframe
 - Names of the specific ECPs to which the issuer has offered contracts that are still pending
 - Contingency plans for how the issuer's provider network, as currently designed, would provide adequate care to enrollees who might otherwise be cared for by relevant ECP types that are missing from the issuer's provider network

Deficiencies and Justifications

- Additional justification examples would include:
 - A medical facility that appears on the Final 2019 ECP List but has recently closed or no longer provides dental services (the latter being an example of a justification for an SADP issuer).
 - A medical facility that appears on the Final 2019 ECP List but has indicated that it no longer contracts with any Marketplace plans.

Where to Find Tools, User Guides, and References

- CMS has posted the Review Tools at the following location:
 - <https://www.ghpcertification.cms.gov/s/Review%20Tools>
- The ECP/NA Template and Instructions can be found at the following location:
 - <https://www.ghpcertification.cms.gov/s/ECP%20and%20Network%20Adequacy>

Live Q&A

Questions

Please help us provide an accurate response by identifying your State when asking a question.

To submit or withdraw questions by phone:

- To submit a question, dial 'star(*) pound(#)' on your phone's keypad.
- To withdraw a question, dial 'star(*) pound(#)' on your phone's keypad.

To submit questions by webinar:

- Type your question in the text box under the 'Q&A' tab and click 'Send.'

If you are not able to ask your question during today's session, or if your question is best answered by subject matter experts (SMEs) outside Plan Management (PM), you may submit it via CMS_FEPS@cms.hhs.gov with the subject line "State Question."

State Regulators Webinar Session Survey

- CMS welcomes your feedback regarding this webinar series and values any suggestions that will allow us to enhance this experience for you.
- Shortly after this call, we will send a link to you for a convenient way to submit any ideas or suggestions you wish to provide that you believe would be valuable during these sessions.
- Please take time to complete the survey and provide CMS with any feedback.



Closing Remarks