

Overview of The Plan ID Crosswalk Review Tool for Plan Year (PY) 2018

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Center for Consumer Information and
Insurance Oversight (CCIIO)

Intended Audience

- Please be advised that the intended audience for this webinar is State Regulators in Federally-facilitated Marketplace (FFM) States performing Plan Management activities. 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 60-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.

Disclaimer

The information provided in this presentation is intended only as a general informal summary of technical legal standards. It is not intended to take the place of the statutes, regulations and formal policy guidance that it is based upon. This presentation summarizes current policy and operations as of the date it was presented. Links to certain source documents have been provided for your reference. We encourage audience members to refer to the applicable statutes, regulations and other interpretive materials for complete and current information about the requirements that apply to them.

Agenda

- Plan ID Crosswalk Overview
- Plan ID Crosswalk Tool Overview
- Plan ID Crosswalk Common Errors
- Plan ID Crosswalk Demo

Plan ID Crosswalk Overview

Template Background

- Crosswalks 2017 Plan ID and service area combinations to a 2018 Plan ID for the purpose of auto re-enrollment into 2018 coverage
- Varies in complexity depending on changes in service areas and plan offerings
- Completed by individuals offering Qualified Health Plan (QHP) and/or Stand-alone Dental Plan (SADP) plans in 2017 through FFM, State Partnership Marketplace (SPM), and State-based Marketplace utilizing the Federal Platform (SBM-FP) states

Operational Uses

- 834 enrollment transactions from the Marketplace to issuer
- Consumer support via HealthCare.gov and federal call centers
- Public Use File (PUF) for transparency and timely benefit/rate analyses

Plan ID Crosswalk Overview: Submission Process

- All issuers that offered Individual Market QHPs through the FFMs, SPMs, and SBM-FPs for 2017 should submit Plan ID Crosswalk template(s) to CMS. CMS will not review plans offered through the Small Business Health Options Program (SHOP) Market
 - Applies to SADPs
 - Submit template in eXtensible Markup Language (XML) format to QHP_Applications@cms.hhs.gov
 - Multi-State Plan (MSP) Program issuers complete template but follow a different submission process based on Office of Personnel Management (OPM) instructions
 - Crosswalk templates must include all plans offered during PY 2017, regardless of if the plan will be discontinued or withdrawn and not offered during PY 2018.
- Key Dates
 - Submission timeline is similar to the other QHP Application templates.
 - Addendum to the Final 2018 Letter to Issuers and template instructions include more details on specific dates.

Plan ID Crosswalk Overview: Submission Process (continued)

- Error Notices
 - CMS anticipates sending stand-alone Crosswalk Template errors in a separate notice but along the same timeline as other QHP certification notices.
- State Authorization of the Plan ID Crosswalk Template
 - Issuers will submit evidence from state that the issuer is authorized to submit the Plan ID Crosswalk Template to CMS.
 - States have opportunity to review template for compliance with Affordable Care Act market reforms such as uniform modification of coverage standards.

Plan ID Crosswalk Overview: Guaranteed Renewability

- Guaranteed Renewability of Coverage: Transfer of Products to a Related Issuer
 - 45 CFR 147.106(e)(3)(i) as amended by the 2018 Notice of Benefit and Payment Parameters provided, for purposes of guaranteed renewability, a product will be considered to be the same product when offered by a different issuer within an issuer's controlled group, provided it otherwise meets the standards for uniform modification of coverage.

Plan ID Crosswalk Overview: Medicare Anti-Duplication Validation Checks

- The template now includes two (2) questions that evaluate whether the 2018 QHP duplicates Medicare and is a change of policy or contract.
 - “Are you prohibited from selling or issuing the 2018 QHP to someone enrolled in Medicare as set forth in Section 1882(d) of the Social Security Act?”
 - Does reenrollment in the 2018 QHP represent an enrollment into a new policy or contract under state law for enrollees in the 2017 QHP?

Plan ID Crosswalk Tool Overview

- Compliance with 45 C.F.R. 155.335 (j). Illustrative examples include:
 - If the same Plan ID is available in 2018, the 2017 Plan ID should be crosswalked to the same Plan ID.
 - If the same Plan ID is not available, the 2017 plan should be crosswalked to a plan with the same metal level and Product ID.
 - If the enrollee's current QHP is a silver level plan, the enrollee should be re-enrolled in a silver level QHP under a different product offered by the same QHP issuer that is most similar to the enrollee's current product.
- Consistency with submitted Service Area and Plans and Benefits Template data for both 2017 and 2018. Illustrative examples include:
 - All FFM plans offered in 2017 are accounted for in the Crosswalk.
 - All counties covered in 2018 plans' service areas are accounted for in the Crosswalk.
 - All 2017 enrollment options for a 2017 plan are crosswalked to a valid 2018 plan.
 - Crosswalk reasons are consistent with plan offerings (e.g., issuer does not indicate they are discontinuing a product when 2018 plan offerings indicate otherwise).

Plan ID Crosswalk Common Errors

- Plan ID {54321FL1234567} from 2016 has been crosswalked to a plan with a different Issuer ID for 2017.
- Plan ID {54321FL1234567} from 2016 has been crosswalked to a plan at a different metal level for 2017.
 - However, a plan at the same metal level will be offered for 2017.
- The issuer has not submitted evidence of State Authorization of their plan crosswalk.
 - Issuers must submit a State Authorization form.

Plan ID Crosswalk Tool Demo

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."

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- 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