

Overview of The Plan ID Crosswalk Review for PY 2019

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**Qualified Health Plan (QHP)
Issuer Conference**

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Agenda

- Plan ID Crosswalk Overview
 - Key Changes for PY2019
 - Submission Process
- Plan ID Crosswalk Tool Overview
- Plan ID Crosswalk Common Errors

Plan ID Crosswalk Overview

Template Background

- Crosswalks 2018 Plan ID and service area combinations to a 2019 Plan ID for the purpose of auto re-enrollment into 2019 coverage
- Varies in complexity depending on changes in service areas and plan offerings
- Completed by Individual Market issuers offering QHP and/or Stand-alone Dental Plan (SADP) plans in 2018 through Federally-facilitated Exchanges (FFE), State Partnership Exchanges (SPE), and State-based Exchanges utilizing the Federal Platform (SBE-FP) states

Operational Uses

- 834 enrollment transactions from the Exchange 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: Key Changes for PY2019

- All required Plan ID Crosswalk submissions, including the Plan ID Crosswalk template, state authorization, and pertinent justification must be submitted through the Plan Management Community
- If an issuer does not provide a crosswalk for a discontinued plan to another product within the service area, but still offers products in that same service areas, CMS, in accordance with the hierarchy established in 45 CFR 155.355(j)(2), will crosswalk the discontinued plans to another product offered by the same issuer

Plan ID Crosswalk Overview: Submission Process

- All issuers that offered Individual Exchange QHPs through the FFEs, SPEs, and SBE-FPs for 2018 should submit Plan ID Crosswalk template(s) and other required information to the Plan Management Community. 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 the Plan Management Community.
 - Multi-State Plan (MSP) Program issuers should also coordinate with the Office of Personnel Management (OPM) for submission instructions.
 - Crosswalk templates must include all QHPs offered during PY 2018, regardless of if the plan will be discontinued or withdrawn and not offered during PY 2019.
- Key Dates
 - Submission timeline is similar to the other QHP Application templates.
 - The Final 2019 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 Patient Protection and Affordable Care Act (PPACA) market reforms such as uniform modification of coverage standards.

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 2019, the 2018 Plan ID should be crosswalked to the same Plan ID.
 - If the same Plan ID is not available, the 2018 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.
 - **NEW for PLAN YEAR 2019:** Issuers should crosswalk any discontinued PY2018 plan to an available plan in a different product, if one exists. If an issuer does not provide a crosswalk for a discontinued plan, but still offers products in that same service area, CMS, in accordance with the hierarchy established in 45 CFR 155.355(j)(2), will crosswalk the discontinued plan to another product offered by the same issuer under the same Health Insurance Oversight System (HIOS) ID.

Plan ID Crosswalk Tool Overview

(Continued)

- Consistency with submitted Service Area and Plans and Benefits Template data for both 2018 and 2019. Illustrative examples include:
 - All FFM plans offered in 2018 are accounted for in the Crosswalk.
 - All counties covered in 2019 plans' service areas are accounted for in the Crosswalk.
 - All 2018 enrollment options for a 2018 plan are crosswalked to a valid 2019 plan.
 - Crosswalk reasons are consistent with plan offerings (e.g., issuer does not indicate they are discontinuing a product when 2019 plan offerings indicate otherwise).

Plan ID Crosswalk Common Errors

- Plan ID {54321FL1234567} from 2018 has been crosswalked to a plan with a different Issuer ID for 2019.
- Plan ID {54321FL1234567} from 2018 has been crosswalked to a plan at a different metal level for 2019.
 - However, a plan at the same metal level will be offered for 2019.
- The issuer has not submitted evidence of State Authorization of issuer's plan crosswalk.
 - Issuers must submit a State Authorization Form.

Questions

