Plan Year (PY)20 Data Integrity Tool

May 14, 2019

2019 Qualified Health Plan (QHP) Series

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Intended Audience

- The Data Integrity Tool presentation is relevant to Qualified Health Plans (QHPs) and Stand-alone Dental Plans (SADPs) in the Federally-facilitated Exchanges (FFEs), and State-based Exchanges on the Federal Platform (SBE-FP).

Agenda

- Session Guidelines
- Announcements
- PY20 Data Integrity Tool (DIT)
- Question & Answer (Q&A) Session
- Resources
- Closing Remarks

Session Guidelines

- This is a 60-minute session.
- This webinar will provide an opportunity for Center for Consumer Information and Insurance Oversight (CCIIO) PM Subject Matter Experts (SMEs) to provide an overview of Data Integrity Tool.
- For questions regarding content, contact the Centers for Medicare & Medicaid Services (CMS) Help Desk by email at: CMS_FEPS@cms.hhs.gov or by phone at: (855) 267-1515.
- For questions regarding logistics and registration, contact the Registrar at: (800) 257-9520.

Additional Webinar Sessions

All questions regarding Enrollment or External Data Gathering Environment (EDGE) Server can be addressed during the following webinar sessions:

Program Area	Day	Time (ET)
Enrollment	Mondays (Bi-Weekly)	12:00 p.m. – 1:00 p.m.
EDGE Server	Tuesdays	11:30 a.m. – 1:00 p.m.

Please register if you wish to participate, even if you have registered for a previous series. For registration and additional information on CMS' webinar series, please log in to https://www.REGTAP.info.

Upcoming Key Dates for PY19 QHP Certification

Date	Category	Activity
Prior to May 16, 2019	Plan Data Change	PY19 April Data Correction Window (DCW) Approximate Data Refresh Date

Upcoming Key Dates for PY20 QHP Certification

Date	Category	Activity
April 25 – June 19, 2019	QHP Certification	PY20 QHP Application Initial Submission Window
Wednesday, May 22, 2019	QHP Certification	**Deadline for Issuers to Submit Templates for the PY20 Optional Early Bird Review Round**

Announcements

PY20 Data Integrity Tool

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Purpose of Data Integrity Tool (DIT)

- Excel-based tool for issuers and State reviewers:
  - Identifies critical data errors within and across templates for on-Exchange QHPs and SADPs
    - Can also identify data errors in off-Exchange individual market and small group medical plans, and off-Exchange SADPs
  - Flags data errors that
    - Exclude plans from consumer display
    - Show incorrect plan information to consumers
    - Are out of legal or regulatory compliance such as market-wide requirements
  - Provides immediate feedback about data irregularities, potentially reducing need for issuer resubmissions

Overview of DIT Functions

- Imports QHP and SADP data from application templates
- Produces report that identifies
  - Data errors and warnings (within an imported template or between two [2] imported templates)
    - *Errors*: flag data that must be corrected
    - *Warnings*: flag data for double-checking; may or may not require correction
  - Identifies location in the template of the data error or warning

DIT Updates for PY20

New Error Validations

- *All Plans:* URLs that contain a blank space within the URL
- *QHPs*: Rating Areas in the Rates Table template that are not found in the Unified Rate Review Template (URRT)

New Warning Validations

- *QHPs*: Following values should be equal between the Rates Table template and URRT when rounded to the nearest dollar:
  - Product of (Calibrated Adjusted Index Rate * Rating Area-specific Factor) of the URRT = Age 21 non-tobacco QHP rate, for the corresponding Rating Area in the Rates Table template
  - Validation excludes issuers in States with state-specific age curves where the rating factor is not 1.000 for the Age 21 non-tobacco QHP rate: DC, MA, NJ Small Business Health Options Program (SHOP) market

DIT Updates for PY20 (Continued)

New Warning Validations (Continued)

- *QHPs*: Plan Marketing Name contains the term “HSA” but is not categorized as HSA-Eligible
- *Individual Market QHPs*: Missing Enrollment Payment URL
- *Child-only Plans*: Missing dependent relationship of “Brother and Sister”

Expansion of Existing Warning Validation

- *Individual Market Plans*: Missing Spouse and Child dependent relationships (child, adopted child, foster child, stepson or stepdaughter)

Removal of Error Validations

- *QHPs*: Consistency in Essential Health Benefit (EHB) percent of total premium between the Plans & Benefits template and URRT (this field is removed in the PY20 URRT)

Data Integrity Reviews

- While CMS expects issuers to use the DIT before each submission, CMS will also conduct data integrity reviews on all 2020 QHP and SADP applications
- CMS will send data integrity review results for on-exchange plans to issuers in the FFEs and SBE-FPs
- CMS will send summary review results for on-exchange plans to states for all QHP and SADP submissions

DIT Demo

Frequent DIT Review Errors in PY19

Frequent DIT Review Errors in PY19

Data Integrity Review Errors (Deficiency Code):

1. Missing Summary of Benefits & Coverage URL (990000621)
2. Service Areas with Missing Rates (990000551)
3. Business Rules Market/Dental Overwrite for SERFF-submitting Issuers (990000771)
4. Rate Effective and Rate Expiration Dates for Individual Market Plans (990000381)
5. Compliance with Federal Age Curve for QHPs (990000371)

Missing Summary of Benefits & Coverage URL (990000621)

- Sample Message:

  DIT ERROR: Plan ID 12345XY0090017 in the Plans & Benefits Template is missing the Summary of Benefits & Coverage (SBC) URL. SBC URLs must be provided by the final submission deadline on August 22, 2018. URLs must be active by the time the issuer has signed its QHP agreement.

  To resolve this error, please provide a Summary of Benefits & Coverage (SBC) URL in the Plans & Benefits template. For PY20, the final submission deadline is August 21, 2019.

Service Areas with Missing Rates (990000551)

- Sample Message:

  DIT ERROR: Plan ID 12345XY0010006 is missing rates for Rating Area 1. Plan ID 12345XY0010006 is associated with service area ID XY001, which covers the following counties in Rating Area 1: Jones, Adams.

  To resolve this error, please ensure that each plan listed in the Rates Table template has rates for each Rating Area associated with a plan's Service Area. For PY20, the final submission deadline is August 21, 2019.

Business Rules Market/Dental Overwrite for SERFF-submitting Issuers (990000771)

- Sample Message:

  DIT ERROR: The Business Rules Templates have an issuer level discrepancy between the Individual Medical market binder and the Individual Dental market binder. In particular, for the “Is there a maximum age for a dependent?” field, the Individual Medical market binder is equal to "25" while the Individual Dental market binder is equal to "21".

  To avoid this error, please ensure that the issuer level rules are consistent across all market binders. You may create product or plan level rules for products or plans that do not adhere to the business rules set at the issuer level.

Rate Effective and Rate Expiration Dates for Individual Market Plans (990000381)

- Sample Message:

  DIT ERROR: The following individual market plans have a rate effective date of 1/1/2019 and a rate expiration date of 12/13/2019: 12345XY0030001, 12345XY0030002.

  To resolve this error, please ensure that the rate effective date is 1/1/2019 and the rate expiration date is 12/31/2019. For PY20, the rate effective date should be 1/1/2020 and the rate expiration date should be 12/31/2020.

Compliance with Federal Age Curve for QHPs (990000371)

- Sample Message:

  DIT ERROR: Plan ID 12345XY0100001 in Rating Area 3 varies by $2.00 or more from the federal age curve for the following age bands: 17 for effective dates 1/1/2019 – 12/31/2019.

  To resolve this error, please ensure that each age-based rate does not vary more than $2.00 from the federal age curve. Note that a separate validation is run for QHP issuers in states with state-defined age curves.

Open Q&A Session

Questions?

- 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."*

Submission of Inquiries

Users/Issuers can contact:

- **CMS Help Desk** with questions about specific situations, the Federal Templates and their functionality and Health Insurance Oversight System (HIOS)
  - **Call: 855-CMS-1515**
  - **Email:** CMS_FEPS@cms.hhs.gov
- **National Association of Insurance Commissioners (NAIC)** with questions about state requirements/System for Electronic Rate and Form Filing (SERFF)
  - **Email:** serffplanmgmt@naic.org

Best Practices- Submitting Help Desk Tickets

- Include HIOS ID, issuer state and issuer legal name.
- Include screenshots or attach templates when asking about an error or issue with the template.
- Submit separate Help Desk requests for different, unrelated questions.
- Put the question in the body of the email; do not attach Excel or Word documents with lists of questions.
- Identify or note whether a question is for the Small Business Health Options Program (SHOP) or Individual Exchange.

HIOS User Group Conference Call

- HIOS User Group Conference Call occurs every Wednesday from 2:00 p.m. to 3:30 p.m. Eastern Time (US & Canada) (GMT-05:00)
- Call Access: 1-888-455-8828; Passcode: 6714482

Plan Management Webinar Dates

The QHP May Webinar sessions occur on Tuesdays and Thursdays as shown below:

Date	Day	Time (ET)	Topic
05/16/19	Thursday	1:00 p.m. – 2:00 p.m.	Allowable Data Corrections & Certification Timeline Refresher
05/21/19	Tuesday	3:00 p.m. – 4:00 p.m.	Open Q&A
05/23/19	Thursday	1:00 p.m. – 2:00 p.m.	Non-Discrimination Benefit Review Tool
05/30/19	Thursday	1:00 p.m. – 2:00 p.m.	PM Community: Corrections Released in the Community and What to Expect for Early Bird Review Results

Resources for QHP Plan Maintenance and Certification

Resource	Resource Link
CMS Regulations and Guidance	https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/index.html
Qualified Health Plan (QHP) Application Materials	https://www.qhpcertification.cms.gov/s/Application%20Materials
QHP Application Review Tools	https://www.qhpcertification.cms.gov/s/Review%20Tools
Registration for Technical Assistance Portal (REGTAP)	https://REGTAP.info
Health Insurance Oversight System (HIOS)	https://portal.cms.gov/wps/portal/unauthportal/home/
System for Electronic Rate and Form Filing (SERFF)	https://login.serff.com/

Commonly Used Acronyms

Acronym	Definition
AV	Actuarial Value
BHP	Basic Health Program
ECP	Essential Community Provider
EHB	Essential Health Benefit
EIDM	Enterprise Identity Management
FFE	Federally-facilitated Exchange
HIOS	Health Insurance Oversight System

Commonly Used Acronyms (Continued)

Acronym	Definition
MSP	Multi-State Plans
NAIC	National Association of Insurance Commissioners
NCQA	National Committee for Quality Assurance
QHP	Qualified Health Plan
SBE	State-based Exchange
SERFF	System for Electronic Rate and Form Filing
USP	United States Pharmacopeia

Closing Remarks