Non-Discrimination Benefit Review Tool

May 23, 2019

2019 Qualified Health Plan (QHP) Series

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The information provided in this presentation 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 shared. Links to certain source documents may have been provided for your reference. We encourage persons attending the presentation to refer to the applicable statutes, regulations, and other guidance for complete and current information.

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Agenda

- Session Guidelines
- Announcements
- Non-Discrimination Benefit Review Tool
- 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 and demo of the Non-Discrimination Benefit Review 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 Plan Year (PY)19 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

Non-Discrimination Benefit Review Tool

- CMS performs Non-Discrimination Cost Sharing Review for individual market QHPs in the Federally-facilitated Exchanges (FFE). The review is not applicable for Catastrophic plans or Stand-alone Dental Plans (SADPs).
- The corresponding Non-Discrimination Benefit Review Tool:
  - Performs an outlier analysis for "QHP Discriminatory Benefit Design" as discussed in the 2020 Letter to Issuers.
  - Reviews a set of benefits and identifies any plan that has a significantly higher copay or coinsurance compared to others in the state and nation.
  - Imports Plans & Benefits Template data from the Master Review Tool.
- As the tool compares data from ALL issuers in a state, the tool will not yield meaningful results if run by a single issuer.
  - Use of this tool by individual issuers is not recommended. The tool is provided to issuers to give transparency into how the CMS review is conducted. States may use this tool.

Non-Discrimination Review Tool Demo

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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 Thursdays as shown below:

Date	Day	Time (ET)	Topic
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

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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