

QHP Certification Process in State Partnership Marketplaces



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Human Services (HHS)*

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Purpose

1. Provide an overview of the QHP certification process in the FFM and in State Partnership Marketplaces.
2. Provide a general timeline for the QHP certification process.
3. Clarify Issuer, HHS and state responsibilities in the certification process.
4. Review key issues for states to consider while planning the QHP certification process.

QHP Certification Systems

State Partnership Marketplaces (including States performing <u>all</u> Application reviews)	
QHP Activity	System
QHP Application Collection (first submission and any resubmissions to cure deficiencies)	SERFF
QHP Application Review	State Systems
QHP Plan Preview	HIOS

Overview of the QHP Certification Process

Steps within the QHP certification process:

1. Issuer application access and submission
2. HHS and state review processes
3. Issuer resubmissions
4. Issuer plan preview
5. HHS certification of QHPs

Cross-cutting issues to consider

Questions to consider for developing QHP certification process:

- **TIMING/WINDOWS:** What is the timeline for each phase of the QHP certification process?
 - Will you set windows to ensure timely submissions?
 - Will resubmissions be allowed at any time? What level of revisions will you permit?
- **INFORMATION:** How are you telling issuers about your process? A formal announcement or sub-regulatory guidance or instructions?
- **ISSUER SUPPORT:** How will you support issuers throughout the process? A help desk? Trainings and user group calls? Published FAQs?
- **STAFFING:** How will you ensure adequate staffing to perform plan management activities? Consider peaks and valleys of work.

HIOS Registration

- Purpose of HIOS registration for SPM issuers:
 - Generates a HIOS user ID for the issuer for linkage of state and federal records for a given issuer or QHP.
 - Provides QHP issuers with access to HIOS to engage in federal-led activities, such as plan preview and QHP agreement signing.
- Action items for Issuer HIOS registration:
 - Log in to HIOS and complete system registration to obtain HIOS user IDs.
 - Define user roles (i.e., data submitter, data validator, and attester) associated with HIOS user IDs.

QHP Application Submission

Action Items for QHP Application Submission Process:

- State sets timeline for Application submission.
- Issuers submit:
 - QHP Applications into SERFF.
 - Issuer-level and plan-level rate data and information through templates.
 - Supporting documentation.

Considerations for QHP Application Submission Process

ISSUES AND QUESTIONS TO CONSIDER:

- Will you set varying deadlines for different parts of the application (e.g., issuer-level data due before rates and benefits, especially if benefit and rate submission is later)?
- Will you allow issuers to re-submit after they've finalized their submission (i.e., while the window remains open)?

EXAMPLE (parameters established for the FFM PROCESS):

- One deadline for the entire application
- Opportunity to re-submit at any time until the deadline

Accreditation Timeline

Timeline for Accreditation Requirements in FFM/SPM

Certification	QHP Issuers Without Existing Accreditation	QHP Issuers With Existing Commercial/Medicaid Accreditation in the State
Year 1 (2013)	Schedule or plan to schedule accreditation review	Existing accreditation accepted
Years 2 and 3 (2014 & 2015)	QHP policies and procedures must be accredited	Existing accreditation accepted if accredited policies and procedures comparable to QHP
Year 4 (2016)	QHP issuer must be accredited in accordance with 45 CFR 156.275	

Overview of Application Review Process

- **Review, re-submission, and notification of deficiencies:**
 - Each state will define the relevant submission window, as well as dates and processes for sending deficiency notices, and accepting Application corrections and resubmissions.
- **Notification of state recommendation of QHP for certification by the FFM:**
 - States may communicate to Issuers via indicators within SERFF whether their QHPs are being recommended for certification in the FFM.

Application Review: Initial Submission

ISSUES AND QUESTIONS TO CONSIDER

- Will you review on a rolling basis or wait until all applications are submitted?
 - May depend on the number of applications expected and the level of staffing.
 - Will depend on the type of review (for instance, can't do outlier analysis prior to receiving all applications)
- Which information will be manually evaluated versus an automated evaluation? Will there be Q/A review of automated checks?
 - Will you hire staff to do the evaluations? Will they need training or Standard Operating Procedures?

Application Review: Initial Submission, continued

ISSUES AND QUESTIONS TO CONSIDER (continued)

- Will you create a formalized process to identify and assign deficiencies?
 - Will decisions to disqualify be automatic (if you're missing X, automatic disqualification) or will there be a manual review process?
 - Are there deficiencies you'd identify and be concerned about, but allow through increasing post-certification monitoring?
 - As you think through deficiencies, consider which might be “show-stoppers”/ definitely disqualifying.
- What application standards need more leniency (e.g., making exceptions in the case of limited applications in some service areas)?

Application Review: Initial Submission, continued

EXAMPLE (parameters established for the FFM PROCESS):

- The FFM will conduct initial review in May – mid-June:
 - Some sections will be evaluated upon resubmission until the deadline (e.g., admin and accreditation).
 - Most sections will be reviewed once all applications are received (e.g., we are not doing rolling reviews of benefits and rates because of inter-dependencies).
- The FFM will identify deficiencies in QHP Applications.

Application Review: Resubmission

ISSUES AND QUESTIONS TO CONSIDER:

- Will you have a rolling or a set window for resubmissions?
 - Trade-off between time to review and chance for issuers to improve accuracy.
 - Consider expected volume and needed staffing levels.
- How will you know that the issuer wants to resubmit?
- How will issuers know they're allowed to resubmit?
- What are the potential impacts on length of review period and data synching?
 - Impact of changes throughout the application. For instance, if issuer is revising one section, will resubmitted data impact other sections that you already reviewed/approved?
 - Set resubmission windows can help minimize impact risks, especially in a state with high volume.
- Will the state allow changes beyond what's identified in deficiencies?
 - Will your system be capable of distinguishing old and new submissions or will you have to conduct a manual comparison?
 - If not, how will the state verify?

Application Review: Resubmission, continued

EXAMPLE (parameters established for the FFM PROCESS):

- The FFM will have one short resubmission window to allow adequate time for re-review (6/17-6/21).
- The FFM will allow only those changes that are required by HHS or the state.
- The FFM won't allow changes for reasons beyond those identified above. The FFM will enforce this restriction by:
 - Collecting attestation from issuer that they didn't make changes.
 - Conducting system checks for differences.

State Submission of Review Results

On July 31, 2013:

- **State submits final QHP certification recommendations to HHS:**
 - States submits its QHP certification recommendations and final reviewed QHP data on “passed plans” into SERFF (includes all data on “passed plans” for populating the consumer-facing Marketplace web portal).
- **Concurrently, HHS conducts QHP certifications:**
 - HHS reviews all state evaluation results for each QHP to begin the final certification process.
 - HHS loads QHPs onto the plan preview portal.

Plan Preview

- **Issuers view their QHPs as they will be displayed to consumers on the Marketplace Web Portal:**
 - Benefits data: Issuers view detailed benefit information for eligible Issuer's QHPs.
 - Rates data: Issuers view detailed premium information for eligible Issuer's QHPs.
- **Issuers review for:**
 - Accuracy of data.
 - Correct display of Benefit data.
 - Correct display of plans and rates.
- **NOTE: QHP display on Plan Preview does not guarantee QHP certification.**

Plan Preview, continued

- If inaccuracies in data are found, Issuers will inform the FFM/state through e-mailing or calling the FFM Help Desk.
- Only changes not requiring re-evaluation of data will be permitted.
- Issuers with approved changes re-submit applications into SERFF:
 - State opens SERFF submission window to allow corrections.
 - State has the option to participate in FFM “Tiger Team” sessions to determine which corrections will be allowed:
 - Will require daily calls during the plan preview period and rapid turn-around to open submission window.
 - States electing not to participate have the option to open the submission window within a several-hour turnaround based on FFM request, or to leave the SERFF window open for all issuers.

Final Plan Notifications and Confirmation of Offerings

Notifications:

- Issuers will receive a notice of the final certification decision on each QHP and an invitation to sign the QHP Agreement from the FFM.
- Issuers will have the opportunity to withdraw plans before agreement.

Confirmation:

- To confirm plan offering, Issuers will verify that:
 - All plans being offered are approved or deemed by the state.
 - The final set of certified QHPs being offered complies with offering rules (e.g., all service areas covered; at least one silver and one gold plan offered).
- Issuers must confirm final plan offering *before* signing QHP Agreement.

QHP Agreement and Attestation

- After confirming final plan offerings, Issuers sign the QHP Agreement, including attestations.
- Issuers designate specific role in HIOS for QHP Agreement signing:
 - Issuer must designate this role to the appropriate individual.
 - Guidance on who can fulfill this role is forthcoming.
- HIOS transmits data on final offerings to SERFF.

QHP Certification Timeline in the SPE

Activities	Dates (2013)
Issuers register in HIOS	Already in process
Issuers submit QHP certification applications to Exchange in SERFF	According to State Timeline April – June
State reviews QHP data submitted by issuers	According to State Timeline through July 31
State submits QHP recommendations to HHS; SERFF transmits issuer data for all recommended QHPs to HIOS	July 31
Issuers review data during plan preview period; Issuers address data errors	August 22-26
HHS notifies all issuers of QHP Certification decision; HHS and issuers sign QHP agreement	September 4-9
Consumer open enrollment begins	October 1