



Rating – Frequently Asked Questions 2014

Question	Answer
1. What are the applicable rating areas for Ohio?	Ohio has 17 approved rating areas for the individual and small group markets. Click here for a map of the approved areas. <i>updated 2/13/14</i>
2. Which rating factors will apply to: a) employers with employees residing across the state or out-of-state; and b) students that are out of state and covered under their parents' plan?	In determining which rating factors an insurer must apply to employers with employees residing across the state or out-of-state and employee dependents living out-of-state, the insurer must apply the rating factors applicable to the employers' principal place of business. <i>updated 2/13/14</i>
3. What are the applicable timelines for rate filings for products being sold on the exchange?	In order for ODI to transfer approved products to the Exchange, insurers need to submit rate filings for QHP/exchange products before May 23, 2014 . Please note we encourage insurers to file rates for QHPs that will also be sold off exchange at this time. <i>updated 2/13/14</i>
4. Regarding the Rate Filing Guidance Checklist, is there a separate version for Large Group filings?	This checklist has been updated to address applicability for Large Group filings. Pages 4-8 do not apply to Large Group filings. <i>updated 2/26/14</i>
5. Per Federal communications the URR Module of HIOS is now capable of handling quarterly index rate submissions for Small Group market single risk pools. Will ODI accept filings for 3rd and 4th quarter rate updates and has ODI set timelines for these rate filings?	<ul style="list-style-type: none">○ Yes, ODI will accept 3rd and 4th quarter rate updates for on and off exchange small group plans.○ For on exchange plans:<ul style="list-style-type: none">▪ 3rd quarter 2014 small group quarterly index rate filings should be submitted via SERFF before April 8, 2014.▪ 4th quarter 2014 small group quarterly index rate filings should be submitted via SERFF before May 23, 2014. The Department cannot accept 4th quarter rate filings after 2015 rate review has begun.▪ When review of the submission is complete, companies will need to submit updated binder

	<p>templates via SERFF for the on exchange rates. ODI expects to release additional timelines for template submissions once CMS finalizes the federal timeframes.</p> <ul style="list-style-type: none"> ○ For off exchange plans: <ul style="list-style-type: none"> ▪ 3rd quarter 2014 small group quarterly index rate filings should be submitted via SERFF before <u>April 8, 2014</u>. ▪ 4th quarter 2014 small group quarterly index rate filings should be submitted via SERFF before <u>July 21, 2014</u>. <i>updated 3/7/14</i>
<p>6. 9/12/14 is the deadline for large group rate filings for 1/1 rates. Is there any limitation on 2/1/15 rates or later?</p>	<p>ODI has not released deadlines beyond those we have already announced. <i>updated 3/25/14</i></p>
<p>7. Are any carriers required to submit a Rate Data Template for off exchange small group and off exchange individual rate filings?</p>	<p>Upon further consideration, carriers are not required to submit a Rate Data Template for off exchange small group and off exchange individual rate filings. This is a change from information provided during training on 3/13/14 and 4/7/14. Please note that the Rate Data Template is still required for on exchange binder filings. <i>updated 6/26/14</i></p>
<p>8. Will the Department issue guidance to carriers regarding its expectations for compliance with the CMS Final Rule on Composite Rating for the small group market beginning January 1, 2015?</p>	<p>Our understanding is that the federal rules require all companies to follow the federally mandated composite rating rules for small employer plans in 2015, if the carrier chooses to use composite rating. Please note these rules are new for 2015 plans and apply both on and off the exchange. ODI is soliciting comments from carriers to determine whether an Ohio specific composite methodology is appropriate and if so, propose such a methodology for use in 2016. Please email planmanagementquestions@insurance.ohio.gov with comments on this issue. <i>updated 9/4/14</i></p>