



# ODI

Ohio Department  
of Insurance

John R. Kasich, Governor

Mary Taylor, Lt. Governor/Director

# Industry Training Webinar

## JUNE 10, 2014

# 2015 Plan Year QHP Applications

## Presenters

- Carrie Haughawout – Assistant Director of Policy and Product Coordination
- Laura Vulpio – Life & Health Chief, Product Regulation & Actuarial Services
- Chris Wright – Life & Health Regulatory Process Mgr., Product Regulation & Actuarial Services
- Matt Elston – Health Actuary, Product Regulation & Actuarial Services

# 2015 Plan Year QHP Applications

## Agenda for Today's Webinar

- 2015 Supporting Documentation Requirements
- Plans & Benefits Template Add-In File
  - 2015 Benchmark Correction Process
  - Demonstration
- CMS State Review Tools
  - Overview
  - Master Review Tool ( with Demo)
  - Data Integrity Tool (with Demo)
- Actuarial Review Requirements
- Q&A
- Closing Remarks

# 2015 Supporting Documentation Requirements

- SERFF Implementation
  - Binder Requirement updates completed as of June 6, 2014
  - Binder drafts created prior to June 6, 2014
    - Issuers do not have to recreate draft Binders
      - » Add missing required documents
      - » Bypass documentation no longer required

# 2015 Supporting Documentation Requirements

- New Requirement
  - Network Adequacy Template
    - Applies to all QHP issuer markets
      - Individual & SHOP Medical Plans
      - Individual & SHOP Stand-Alone Dental Plans

# 2015 Supporting Documentation Requirements (cont'd)

- Tips for Completing Network Adequacy Template
  - National Provider ID (NPI) number
    - Required for Medical Providers
    - Dental Provider Work-Around
  - Network Name and ID
    - Corresponds to Network ID Template
  - Multiple Location Providers

# 2015 Supporting Documentation Requirements (cont'd)

- No Accreditation Documentation required for Accredited QHP Issuers
  - All 2014 QHP issuers must be accredited to offer products on the Exchange in 2015
    - No accreditation documentation required due to the automated SERFF accreditation verification process
  - Issuers offering products on the Exchange for the first time in 2015 do not have to be accredited for 2015, but must attach documentation of a plan to obtain accreditation



# 2015 Supporting Documentation Requirements (cont'd)

- Also Not Required for 2015 (cont'd.)
  - Network Adequacy Cover Letter
  - Licensure & Good Standing Documentation
- Supporting document forms and templates available on HIX page of SERFF website
- Updated 2015 QHP Supporting Documentation Requirements List posted on Plan Management page of ODI website

## Plans & Benefits Template Add-In File

- 2015 Benchmark Correction Process
  - Corrections documented but no changes to 2014 Add-In File template
  - CMS Benchmark Correction Spreadsheet
- Demonstration of how to make Ohio Benchmark corrections

# CMS State Review Tools

- Overview
  - Benefits to issuers
    - Data error identification
    - Cross template validation
    - Helps identify areas that might require justification
    - Avoid template validation resubmissions

## CMS State Review Tools (cont'd)

- Overview (cont'd.)
  - Tools accessible to issuers on CMS Zone website
  - Types of Tools
    - Stand-alone tools
    - Cross template validation tools
    - Market outlier tools

# CMS State Review Tools (cont'd)

## – Review of available tools

CMS State Review Tool	Description
Data Integrity Tool (DIT)	Performs overall data checks against template validation rules and cross validates key fields across templates. The DIT includes validation checks for frequent errors identified in the 2014 submission cycle.
Master Review Tool	Aggregates data from the Plans & Benefits, Service Area, and Essential Community Provider (ECP) templates that is used as the data input file for other review tools. Provides explanation of review standards for several QHP requirements and instruction regarding applicable stand-alone review tools.
Essential Community Providers (ECP) Tool	Calculates the total number of ECPs in each plan's network and compares this to the total number of available ECPs in its service area to determine whether each plan network includes enough ECPs to meet or exceed the required ECP threshold.
Meaningful Difference Tool	Performs the "Supporting Informed Consumer Choice" review, comparing key characteristics of all plans offered by an issuer to identify multiple plans in the same county that do not appear to be meaningfully different to the consumer.
Cost-Sharing Tool	Checks applicable plan cost sharing standards, including Out of Pocket Maximum (OOPM), Cost Sharing Reduction (CSR) Plan Variation, and Catastrophic Plan review.
Category Class Drug Count Tool	Compares the count of unique chemically distinct drugs in each USPv5 category and class for each formulary against applicable state benchmark standards.
Non-Discrimination Clinical Appropriateness Tool	Analyzes coverage of drugs recommended in clinical guidelines for treatment of diabetes, rheumatoid arthritis, bipolar disorder, and schizophrenia, to determine sufficient formulary availability.
Non-Discrimination Formulary Outlier Tool	Performs outlier analysis comparing all QHP plan formularies within a state to identify potentially discriminatory plans with unusually high numbers of drugs subject to prior authorization and/or step therapy requirements in specified USP classes (insulins, anti-diabetic agents, immunomodulators, immune suppressants, and anti-HIV agents).
Non-Discrimination Tool	Performs outlier analysis comparing cost sharing for a pre-determined group of benefits of all QHP plans within a state to identify potentially discriminatory benefit design in plans with significantly higher copay or coinsurance for those benefits.



## CMS State Review Tools (cont'd)

- Master Review Tool
  - Organized source of review standard information
  - Consumes and validates data from Plans & Benefits, Service Area, and ECP templates
  - Demonstration

## CMS State Review Tools (cont'd)

- Data Integrity Tool
  - Performs comprehensive data checks and cross validation, including most data validations in CMS template validation process
  - Provides individual template validation modules and a cross-validation module
  - Run this tool first!
  - Demonstration

# Actuarial Review Requirements

- Unified Rate Review Template
  - Needs to be submitted to CMS via HIOS
  - As rate review is completed, changes to the URRT must be uploaded into the rate filing via SERFF and to CMS via HIOS

## Actuarial Review Requirements (cont'd.)

- Rate Data Template
  - For Off Exchange products, RDT is no longer required in rate filings
  - For On Exchange products, RDT is required in binder filing and it must match the rates specified in rate filing

# Actuarial Review Requirements (cont'd.)

- Plan IDs
  - Plan IDs listed in the various templates and filings must match
    - Rate Filing: URRT
    - Binder Filing: URRT, Plan & Benefits Template, and Rate Data Template
  - Reminder! Plan IDs cannot be added or changed in Binders after submission
    - May enter extra “placeholder” Plan IDs in Binder
    - Template data can be populated or Plan IDs withdrawn later as needed

## Actuarial Review Requirements (cont'd.)

- Rate Review Detail
  - SERFF item for Rate Filings
  - New fields are required
    - HIOS Product ID
    - HIOS Submission ID
  - Update these fields via a Post Submission Update in the Rate Filing

## Actuarial Review Requirements (cont'd.)

- Unique Plan Design Value Adjustments to HHS AV Calculator
  - Documentation required in Rate Filing and Binder:
    - Part III Actuarial Memorandum and Certifications
      - » Exception to required use of HHS AV Calculator and alternate value adjustments used must be indicated and certified by actuary

## Q & A

- Questions from the May 20, 2014 training webinar
- New Questions

# Closing Remarks

- Important Reminders
- Issuer resources for further information:
  - ODI Website Plan Management Toolkit:  
(<http://insurance.ohio.gov/Company/Pages/PlanManagementToolkit.aspx>)
    - Important Announcements
    - FAQs and resources updated regularly
    - Register to receive email notification of updates
  - NAIC/SERFF:
    - HIX Webpage (<http://www.serff.org/hix.htm> )
    - SERFF Application Online Help - Plan Management section

