

Four Keys to Successful Health Exchange Filings

By Sean Cox, HIA, MHP

A major element of healthcare reform is the new state exchanges through which individuals and small employers will be able to comparison shop and purchase coverage. The policies offered will have to provide the essential health benefits mandated by the Affordable Care Act and need insurance department approval before they can be sold. They must be ready for a January 1, 2014, effective date.

For those of us making these exchange filings (more appropriately known as Quality Health Plan (QHP) submissions), it may feel like this new filing process was thrust upon us without much time to learn the new procedures. What best practices have we learned from our initial trial and error? The following are four keys to making successful Plan Management and Health Insurance Oversight System (HIOS) filings.

1. Determine with whom you are filing. Each state has designated how it is handling QHP submissions. For state-based exchanges (now referred to as marketplaces, or state-partnership marketplaces) this is often accomplished by using the Plan Management module of SERFF. For Full Federal Marketplaces these submissions are made through the Health Insurance Oversight System (HIOS). For other states it might be necessary to make submissions through both systems, so identifying which system to use to submit your QHPs is the first step. Thankfully, SERFF has created a helpful chart to easily determine how to file in each state. The State Plan Management Systems Matrix is located on the Health Insurance Exchange Plan Management (HIX) web page, which may be found at <http://www.serff.com/hix.htm>. *Scroll down to the listings under Business on the bottom left to find the link to the matrix.*
2. Know your state filing deadlines. States have the opportunity to set their own filing deadlines, which means that tracking these deadlines and using them to help set your filing priorities is pivotal. Although some of these state deadlines have already passed, there were many early deadlines that needed to be extended by various states. And just to keep things exciting, Stand-Alone Dental Plans (SADPs) have their own set of deadlines. Additionally, we fully expect spring 2014 to bring with it similar state deadlines for the 2015 products, so having a good system to track these deadlines will help keep you on top of these

filings. The State Plan Management Systems Matrix mentioned earlier is a good source for tracking these filing deadlines.

3. Check requirements for plans sold outside the exchange. Companies selling Qualified Health Plans outside of the exchange are not always exempt from the plan management filings process. The plan management filing process is the basis for determining if a plan is truly a Qualified Health Plan. Therefore, many states require a plan management filing for non-exchange plans. Once again the State Plan Management Systems Matrix is a terrific tool for tracking how each state handles this process.
4. Use the templates. Although templates are listed as the final of the four keys, the Templates are easily the most important. The template is an Excel document that was created by the Center for Consumer Information & Insurance Oversight (CCIIO) and is used to list exactly how your plan meets the requirements of a Qualified Health Plan. There are approximately 10 templates that cover all aspects of the Qualified Health Plan and its corresponding rates. These Federal Data Collection Templates are completed and submitted through either SERFF or HIOS, but, regardless of the system that they are submitted in, all templates are validated through HIOS. These templates can be very detailed and require quite a bit of time to complete. Should you have specific questions or problems with a template, then those should be directed to the HIOS helpdesk, also known as the HHS Exchange Operations Support Center (XOSC), at CMS_FEPS@cms.hhs.gov, 1-855-CMS-1515. To have a successful QHP submission, it's a must that your company be familiar with the Federal Data Collection Templates and devote the time and resources necessary to accurately complete them.

Developing a good overall filing strategy that stresses the four key areas outlined above will put your company in a good position to successfully obtain the quickest approval possible for your QHP submissions.

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