

May 18, 2018

Issuers offering QHP and SADP plans in Arkansas:

This update is intended to provide information about the Plan Management functions for the 2019 Plan Year. It outlines guidance for Issuers in the Arkansas Health Insurance Marketplace (AHIM). Additional information is available in the CMS Letter to Issuers, Final Notice of Benefit and Payment Parameters, and the Arkansas Insurance Department (AID) Bulletin (see links in Appendix A).

I. QHP/SADP Certification Roles and Responsibility

- AID regulates and enforces the state's requirements of plans sold on the Exchange by ensuring fair pricing of rates and validating that plans comply with all federal and state standards.
- The annual AID Bulletin to QHP Issuers includes guidance from AHIM, which provides certification standards for the upcoming Plan Year.
- AHIM reviews plans recommended for certification by AID and follows the timeline published in the AID Bulletin. (Refer to Appendix B)
- AHIM implements the procedures and criteria for the certification of QHPs and SADPs, and approves final plans offered on the Arkansas Exchange.

II. Certification Criteria

- Arkansas operates as a State Based Exchange on the Federal Platform (SBE-FP) and AHIM is therefore the entity that is legally accountable for Individual QHP and SADP certification criteria in Arkansas.
- AID will maintain the interpretation of regulatory standards including potential changes to Marketplace rules that allow for more regulatory flexibility. Therefore, plan requirements for the Exchange are subject to review by AID.

III. Relevant Changes for Plan Year 2019:

- The elimination of the Meaningful Difference review. Issuers are able to offer more plan designs and consumers have more plans to choose from.
- The standard criteria required is maintained at 20% for ECPs in a service area for QHPs and the alternate ECP standard for Dental ECPs. For 2019, ECP write-ins count towards the standard.
- Like most states, Arkansas conducts its own rate review and is able to establish a different rate review and justification threshold for Plan Year 2019. Nationally, CMS will increase the threshold from 10 % to 15 %.

IV. Support and Services—Specific to SBE-FP Issuers is the availability of direct communication with local Marketplace staff. When seeking to offer coverage of a QHP or SADP on the

Marketplace, Issuers have access to designated resources in (Appendix A) for assistance throughout the plan certification process.

- As a designated contact person for the state, I am available to assist Issuers with any concerns throughout the certification process.
- Issuers can contact me at any time via email at kayla.berry@armarketplace.com, by contacting the AHIM office at 501-313-4197, or through the Plan Management Community online.
- Plan Management Community
 - Arkansas was one of the first 20 states to participate in the Plan Management Community launched in 2018.
 - The PM Community allows states to communicate directly about any needed changes or corrections for plans recommended during the certification process.
 - Issuers are able to keep up with important dates like standard times for review windows as well as urgent updates or changes.
- Summary of Benefits and Coverage (SBC)
 - Issuers should plan to complete their SBCs early to allow for plan comparison before open enrollment.
 - During the pre-open enrollment plan comparison, SBCs on display provide consumers with details about minimum essential coverage, disclosures, uniform glossary terms, contact information and more.
 - A consumer will need to access completed SBCs to assist them in searching for a QHP or SADP allowing them more time to compare and shop.

The Certification process begins May 18, 2018 for Marketplace Issuers. The guidance given is to benefit Issuers offering QHPs and SADP plans on the marketplace with states having more options due to the flexibility from CMS. I am available to assist any Issuers offering plans either On or Off the Exchange with any questions or concerns throughout certification.

Sincerely,

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Appendix A

| Additional Resources | | |
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| AID Bulletin No.4-2018 | AID Bulletin was published April 13, 2018, it details the certification requirements for Issuers offering QHPs and SADPs on the marketplace. | https://insurance.arkansas.gov/uploads/pages/4-2018.pdf |
| Certification timeline | Outlines Initial QHP application process published by AID and AHIM on May 18, 2018 for Issuers offering QHPs/SADPs on the marketplace. | See certification timeline Appendix B |
| Benchmark checklist | AIDs Checklist to assist Issuers in submission of QHPs 4/16/18 | PY2019 QHP ACA Compliant Benchmark Checklist 04022018.pdf |
| Plan and Benefit Attestation | Checklist to assist issuers in the submission of a QHP or ACA-Compliant Major Medical Product published on 4/16/18. | Plans and Benefits Template Attestation.pdf |
| AID Off marketplace medical filing instructions | AID Instructions for filing QHP plans OFF marketplace 4/16/18 | PY2019 AID QHP Off-Marketplace Major Medical Filing Instructions 04162018.pdf |
| On marketplace QHP/SADP submission instructions | AID Instructions for submitting QHP & SADP plans ON marketplace 4/16/18 | PY2019 On-Marketplace QHP SADP SERFF Binder Submission General Instructions.pdf |
| SADP benchmark checklist | AID Checklist for SADPs being offered in PY19 4/16/18 | PY2019 SADP Benchmark Checklist.pdf |
| SBM attestations | AID State form required to adhere to certification and operational standards of plans on the marketplace 4/25/18 | PY 2019 SBM Attestation v1 031518.pdf |
| Network Adequacy Instructions | AID Network Adequacy submission requirements 4/16/18 | PY2019 SERFF Network Adequacy Data Submission Instructions Ver 1.5.pdf |
| Quality Improvement Attestation | AID State attestation form for quality improvement of plans offered on the exchange 4/16/18 | Quality Improvement Attestation.pdf |
| Plan and Benefits Light Template | AID Light version of Plan and Benefits template 4/26/18 | Plan and Benefits Light Template.xlsx |
| QHP and SADP plan submission requirements | AID Submission requirements for Dental plans 4/26/18 | 2019 AID QHP SADP Plan Management Plan Submission Requirements.xls |
| Off marketplace requirements | AID Submission requirements for OFF marketplace plans 5/9/18 | PY2019 AID Off-Marketplace Binder Submission Requirements 04262018.pdf |
| Plain language summary | AID Arkansas form for Part II of URRT Rate filing justification for plan increases 4/4/17 | AR-Specific Plain Language Summary BlankEditableForm.pdf |

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| Rate Revision request form | AID Form for Rate revision request changes 6/13/17 | BASE L&HRtRevForm Rev2.xls |
| Final Letter to Issuers | CMS document that details the Federal requirements for operational and technical guidance for Issuers seeking certification for PY19. 4/9/18 | https://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/2019-Letter-to-Issuers.pdf |
| Final Notice of Benefit and Payment Parameters | CMS document that details the federal requirements for FFEs and SBE-FP carriers seeking to offer plans on the marketplace 4/9/18. | https://s3.amazonaws.com/public-inspection.federalregister.gov/2017-07712.pdf . |
| QHP Application tools | CMS tools that assist Issuers and state regulators with ensuring all QHPs and SADPs meet federal and state standards. 4/10/18 | https://www.ghpcertification.cms.gov/s/Review%20Tools |
| REGTAP slides | CMS documents that details various tools for offering plans. | https://www.regtap.info/uploads/library/QHPOnsite_ORIGINAL_Issuer_Reviews_5CR_041118.pdf https://www.regtap.info/uploads/library/RR_Key-Dates-Table-for-CY2018_5CR_042318(1).pdf https://www.regtap.info/uploads/library/RR_Key-Dates-Table-for-CY2018_5CR_042318.pdf https://www.regtap.info/uploads/library/QHP_Slides_041718_5CR_042318.pdf https://www.regtap.info/uploads/library/QHP_Slides_041918_5CR_042518.pdf https://www.regtap.info/uploads/library/QHP_Slides_050118_5CR_050218.pdf https://www.regtap.info/uploads/library/QHP_Slides_051518_5CR_051618.pdf https://www.regtap.info/uploads/library/QHP_Slides_050818_5CR_050818.pdf https://www.regtap.info/uploads/library/PMSC_Slides_050818_5CR_051018.pdf https://www.regtap.info/uploads/library/PMSC_050918_5CR_051018.pdf https://www.regtap.info/uploads/library/PMSC_Slides_042518_5CR_051518.pdf |

Appendix B

| Plan Year 2019 Tentative Timeline | |
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| Key Dates | Description |
| May 18 th | QHP and ACA-Compliant health plans (Off-Marketplace) Network Adequacy templates and QHP application templates, including the Rate Data Template and the Rating Business Rules Template, due to AID. |
| May 18 th – June 20 th | AID QHP Review Period |
| June 1 st | All QHP and Off-Marketplace forms except the Summary of Benefits and Coverage and Schedule of Benefits are due to AID. SADP forms due to AID |
| June 20 th | AHIM to submit 1st SERFF Data Transfer for Individual Plans to CMS |
| July 23 rd | QHP Rates and Binder rate data due to AID. |
| July 25 th | Initial Rates due to CCIIO. |
| July 2 nd – August 8 th | AHIM review Period |
| August 1 st | Off-Marketplace forms and Binder data, excluding rates and Binder rate data, due to AID. CMS Notifies Arkansas of any Needed Corrections to Individual QHP Data |
| August 9 th | CMS and AHIM notify Arkansas of any Needed Corrections to Individual QHP Data |
| August 10 th | Deadline for Issuers to Change Service Areas |
| August 17 th | Final changes to QHP rates and QHP applications due to AID. |
| August 22 nd | Deadline for Final Changes to the Individual QHP Application to CMS and AHIM. AID submits recommendation to AHIM for certification of QHPs |
| August 25 th | Off-Marketplace Rates and SADP Rates and Binder rate data due to AID. (Group SADP rates are not reviewed. |
| September 17 th | CMS Posts Plans and Correction Notices. |
| September 25 th | AHIM submits certified plans to CMS. Final Summary of Benefits and Coverage and Schedule of Benefits are due to AID |
| October 4 th | CMS Completes Certifications and Agreements with Issuers. |
| October 15 th | Rates finalized with CCIIO. |
| November 1 st | Open Enrollment Begins. Final Rates posted. |