



Indiana Department of
Insurance

**ACA Related Rate/Form Filing
Industry Webinar**

March 18, 2014

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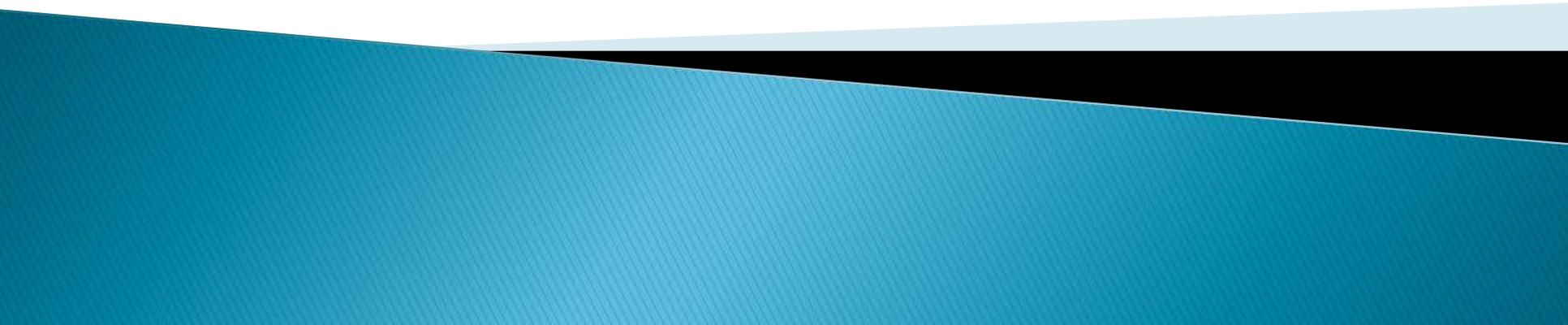
Questions and Compliance Updates

- ▶ Please submit all questions via email to compliance@idoi.in.gov
 - Subject line requirement
 - Indicate whether question is “Rate” or “Form” related
- ▶ Webinar slides and answers to submitted questions will be compiled into a FAQ available on the IDOI website
 - <http://www.in.gov/idoi/2757.htm>
- ▶ [Industry Updates](#)
- ▶ [ACA Rate and Form Filing Q&A](#)

Agenda

- ▶ Overview of relevant ACA requirements and/or changes for the 2015 filing season
 - ▶ Market Reforms/Regulatory Requirements
 - ▶ FFM/EHB Requirements
 - ▶ IDOI Filing Timeline
 - ▶ QHP Filings–SERFF Plan Management
 - ▶ IDOI Roles in the Plan Management Certification Process
 - ▶ Miscellaneous Filing Requirements
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ACA Overview



2015 Considerations for Rate and Form Development

- ▶ There have been numerous sources of additional guidance provided by CMS during the 2014 filing year
 - ▶ The 2015 Rate and form review process will be similar to the process used for 2014 with important changes that will be outlined within this webinar.
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Changes for 2015

- Updated Guidance for ACA filings have come from the following sources:
 - [2015 Final Letter to Issuers](#)
 - [Notice of Benefit and Payment Parameters](#)
 - [Qualified Health Plan Templates](#)
 - Final Revised URRT Template/Instructions
 - 2015 Actuarial Value Calculator
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CMS Guidance Released Today

- ▶ 2015 Exchange and Insurance Market Standards Proposed Rule
- ▶ Final 2015 Annual Letter

Market Reforms / Regulatory Requirements

Summary of 2014–15 Market Reforms

- **Age Rating** (same)
 - 3:1 ratio as stated in the regulation
- **Age Curve** (same)
 - Uniform age curve as stated in the regulation
- **Tobacco Rating** (changed)
 - Limitation goes away in 2015
- **Geographic Rating Areas** (same)
 - Reference [IDOI Bulletin 197](#)

Summary of 2014 –15 Market Reforms (cont.)

- **Family Tiers** (same)
 - Premiums are limited to 3 for those dependents under age 21
 - Must provide coverage to age 26
 - **Premium Basis** (same)
 - Single Risk Pool
 - **Merging Markets** (same)
 - Individual and small group markets will not be merged
 - Maintain separate risk pools
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Potential Changes for Underlying Plan Features

▶ Prescription Drugs

- Prior Authorization
- Step Therapy

▶ Abortion Coverage “OFF” FFM

- Refer to [HB 1123](#) (2014)
 - (a) An accident and sickness insurance policy that is issued, delivered, amended, or renewed after June 30, 2014, may not provide coverage for abortion, except in the following cases:
 - (1) The pregnant woman became pregnant through an act of rape or incest.
 - (2) An abortion is necessary to avert the pregnant woman's death or a substantial and irreversible impairment of a major bodily function of the pregnant woman.
 - (b) An insurer that issues an accident and sickness insurance policy described in subsection (a) may offer coverage for abortion through a rider or an endorsement.

FFM / EHB Requirements

Essential Health Benefits Package

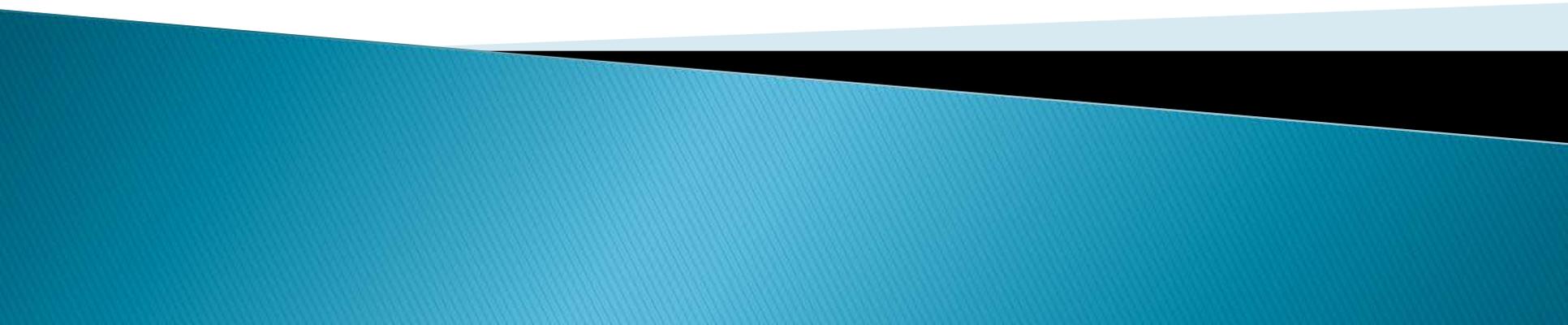
- **State EHB Package**
 - Anthem Blue Access PPO
 - Default Benchmark Plan
 - State Required Benefits
 - Mandates
 - FEDVIP MetLife PPO
 - Pediatric Dental
 - FEDVIP Blue Vision PPO
 - Pediatric Vision

Essential Health Benefits

- EHB Plans and Benefits vs. EHB Verification
- EHB FAQ
 - Substitutions
 - EHB Substitutions NOT Allowed
 - Habilitation and Rehabilitation Services
 - Habilitation Services Covered at Parity with Rehabilitation Services
 - Behavioral therapies such as Applied Behavioral Analysis (“ABA”) may not be subject to limitations that apply to rehabilitative services such as physical, occupational or speech therapy
 - [IDOI Bulletin 136](#) remains in effect and benefits will remain covered under the new plan
 - DSM-IV* Changes
 - The separate diagnostic labels of Autistic Disorder, Asperger’s Disorder, and PDD-NOS will be replaced by one umbrella term “Autism Spectrum Disorder.”
 - SEA 267 (2013)
 - “~~pervasive developmental~~” “an autism spectrum”
 - IC 27-8-14.2-3,4,5,7

*Published by the American Psychiatric Association (APA), the Diagnostic and Statistical Manual of Mental Disorders (DSM) is used to diagnose mental and behavioral conditions

IDOI Filing Timeline



Filing Deadlines for the 2015 Benefit Year

MARKETPLACE	INDIVIDUAL*	SMALL GROUP*
ON	5/11/2014	5/11/2014
ON + OFF	5/11/2014	5/11/2014
OFF	8/16/2014	8/16/2014
DENTAL QHP	5/11/2014	5/11/2014
DENTAL NON-QHP	90 DAYS PRIOR TO IMPLEMENTATION DATE	90 DAYS PRIOR TO IMPLEMENTATION DATE

* Applies to NON-GRANDFATHERED filings

QHP Major Medical Federal Filing Timeline in Indiana

Activity	Approximate Dates
Deadline for Issuers to Submit Plan Data to IDOI via SERFF	5/11/2014
IDOI reviews all QHP and Non-QHP filings ON and OFF the FFM	5/11/2014–8/10/2014
IDOI submits certification recommendations to FFM	8/10/2014
Plan Preview Available	8/12/2014
FFM Reviews Plan Data	8/11/2014–8/25/2014
FFM Notifies Indiana of any Needed Corrections to QHP Data	8/26/2014
Deadline for Issuers to RESUBMIT Plan Data	9/4/2014
FFM Completes Re-Review of Plan Data and Indiana Recommendations	9/20/2014
Open Enrollment Begins	11/15/2014

QHP Filings / SERFF Plan Management

QHP Major Medical Rate Filing

- **SERFF Plan Management**
 - SERFF & HIOS Filing Submission
 - File concurrently
 - Forms/Rates **MUST** be within the same SERFF filing
 - QHP Application
 - For certification of a plan as a QHP for the 2015 benefit year, issuers will be required to submit a complete QHP Application in HIOS, including plans that were certified as QHPs for the 2014 benefit year
 - Complete **ALL** 9 [templates](#)
 - All plans **MUST** provide a copy of the AV calculation page
- Binders
 - Issuers are **REQUIRED** to submit **NEW** binders in SERFF

Non-QHP Major Medical Rate Filing

- **SERFF Plan Management**

- **SERFF Filing Submission**

- Forms/Rates **MUST** be within the same SERFF filing
- Do NOT submit a Binder
- Include the following [templates](#) in SERFF Supporting Documents Tab:
 - EHB Verification Template
 - Prescription Drug Template
 - Rate Template
 - URRT
 - All plans **MUST** provide a copy of the AV calculation page

Unified Rate Review Template (URRT)

➤ Part I

- All Rate Changes (Increases, Decreases, Neutral)

➤ Part II

- Only files that meet the subject to review threshold of 10%

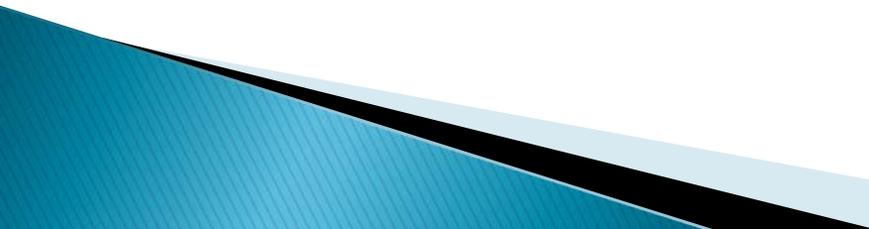
➤ Part III

- All Rate Changes (Increases, Decreases, Neutral)

➤ For QHPs, Parts I, II and III are satisfied by completing the template and narrative in HIOS

- Non QHP include Parts I and III in SERFF Supporting Documents
 - Non-QHP > 10% submit in HIOS

Actuarial Memorandum

- ▶ Provide AV pages for EACH plan
 - ▶ Discuss the 3R's and impact on plans
 - ▶ Reinsurance fees are lower and attachment point is higher
 - ▶ Account for ALL fees – Market share fee, exchange fee, PCORI
 - ▶ Discuss and demonstrate claim cost development
 - ▶ Discuss changes between 2014 Index Rate to 2015 Index Rate
 - ▶ Provide sufficient detail and documentation for any trend factors used
 - ▶ Provide detail split and description of any MLR adjustments
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Roles in the Certification Process

Federally-facilitated Marketplace QHP Certification Requirements

QHP Certification in an FFM (State Performs Plan-Level Review)

IDOI Requirements:

- Ensure Policies Meet EHB Benefit Standards
- Review AV Standards Including Cost-sharing
- Review for Discriminatory Benefit Design
- Review for Meaningful Difference Across QHPs
- Reasonable Service Area
- Review Rates and/or Forms
- Marketing Material Attestation

QHP Certification in an FFM (HHS Performs Issuer-Level Review)

HHS Requirements:

- Administrative Information
- Licensure and in Good Standing
- Network Adequacy
- Essential Community Provider Inclusion
- Accreditation
- Quality Data
- QHP Certification
- QHP Monitoring/Oversight

Miscellaneous Filing Requirements

Definition of Small Group

▶ IC 27-8-15-14

◦ "Small employer"

- Sec. 14. As used in this chapter, "small employer" means any person, firm, corporation, limited liability company, partnership, or association actively engaged in business who, on at least fifty percent (50%) of the working days of the employer during the preceding calendar year, employed at least two (2) but not more than fifty (50) eligible employees, the majority of whom work in Indiana. In determining the number of eligible employees, companies that are affiliated companies or that are eligible to file a combined tax return for purposes of state taxation are considered one (1) employer.

Grandmothered Plans

- ▶ 2013
 - IDOI allowed early renewal of plans on or before 12/31/2013
- ▶ 2014
 - Renewals in 2014 must be an ACA compliant product
- ▶ 2015
 - Please reference [IDOI Bulletin 205](#)

Resources

Resource	Resource Link
IDOI Industry Updates	http://www.in.gov/idoi/files/WebsiteLinkIndustryUpdates(1).pdf
IDOI A&H Product Filing Information	http://www.in.gov/idoi/2771.htm
IDOI Bulletins	http://www.in.gov/idoi/2591.htm
Data Templates	http://www.serff.com/plan_management_data_templates_2015.htm
CMS Regulations and Guidance	http://www.cms.gov/Regulations-and-Guidance/Regulations-and-Guidance.html?redirect=/home/regsguidance.asp
Final Letter to Issuers	http://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/2015-final-issuer-letter-3-14-2014.pdf
Proposed Rule for Exchange and Insurance Market Standards for 2015	http://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/CMS-9949-P.pdf

Weekly FAQ Session

- ▶ Every Friday during the month of April 2014
 - 3:00–4:00pm Eastern
 - Call in: 605–475–4000
 - Passcode: 397597#

- ▶ Questions received by 5:00pm Eastern on Wednesdays will be addressed on Friday’s call
 - compliance@idoi.in.gov
 - Subject line requirement
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Commonly Used Acronyms

Acronym	Definition
ACA	Affordable Care Act
AV	Actuarial Value
CMS	Centers for Medicare and Medicaid
EHB	Essential Health Benefits
FEDVIP	Federal Employees Dental and Vision Insurance Program
FFM	Federally-facilitated Marketplace
HIOS	Health Insurance Oversight System
PPO	Preferred Provider Organization
QHP	Qualified Health Plan
SADP	Stand-alone Dental Plan
SERFF	System for Electronic Rate and Form Filing
SHOP	Small Business Health Options Program
URRT	Unified Rate Review Template

Contact



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