

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
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TRANSPARENCY IN COVERAGE QHP CERTIFICATION SUBMISSION TIPS

Centers for Medicare & Medicaid Services
Center for Consumer Information and Insurance Oversight

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1. Purpose and Overview

This document provides supplemental guidance and submission tips for completing the Transparency in Coverage Template and URL submission for issuers submitting plans for Qualified Health Plan (QHP) Certification during Plan Year (PY) 2022.

The complete [QHP Application Instructions](#) detail the Transparency in Coverage submission process starting on page 2E-1.

The final deadline for submitting a complete Transparency in Coverage Template and URL is August 18, 2021.

All questions related to Transparency in Coverage Template submission can be directed to the Marketplace Service Desk (MSD) at 855-CMS-1515 or CMS_FEPS@cms.hhs.gov.

2. Completing the Plan Level Data tab of the Transparency in Coverage Template

The following section provides tips on completing the Plan Level data tab.

- **Claims and denials data must be provided for all returning plans that were offered in PY 2019.**

All returning issuers with plan IDs that were also offered on the Exchange in PY 2020 must submit numerical transparency data in the Plan Level Data tab. Detailed instructions can be found on page 2E-6 of the [QHP Application Instructions](#).

3. Transparency in Coverage Submissions via System for Electronic Rates & Forms Filing (SERFF)

To successfully submit the Transparency in Coverage template via SERFF, the Plan Level Data tab (second tab) of the Transparency in Coverage Template must include all On-Exchange PY2021 plan IDs submitted in the Plans & Benefits Template. The CMS validation system will reject the Transparency in Coverage template if the On-Exchange plan IDs do not exactly match those in the Plans & Benefits Template. Do not include Off-Exchange-only plan IDs (e.g. Off-Exchange-only Certified Stand-Alone Dental Plans (SADPs)).

We understand that transfer errors may delay the submission of data. CMS will work with issuers and states that try to meet the initial deadline to ensure that all data is submitted for review.

- **Only one Transparency in Coverage Template may be submitted.**

The CMS system allows only one template submission across all binders. All Plan IDs from all On-Exchange plan types associated with an Issuer ID must be included in the same Transparency in Coverage Template.

If an issuer submits two different templates in SERFF (for example, one in the Individual Market SERFF binder and one in the SHOP SERFF binder), each with different plan level information, the CMS system will retain only the most recent template transferred by the state from SERFF. The information submitted on the first template transferred will be overwritten by the information submitted on the second template transferred and so on. To avoid problems related to SERFF overwrite rules, all Transparency in Coverage

Template submissions should be the same across binders for the same HIOS Issuer ID. Failure to submit identical templates with all plan IDs will cause template transfers to be overwritten.

Example:

An issuer has two binders (an Individual Market SERFF binder and a SHOP SERFF binder), with one containing three Plan IDs and the other containing seven plan IDs. The issuer submits identical Transparency in Coverage Templates in both binders, each containing all ten plan IDs. While the Transparency in Coverage Template received from first binder transferred is overwritten with the Transparency in Coverage Template from the second binder transferred, no information is lost and the issuer submits successfully.

- **Transparency in Coverage Templates that are resubmitted via SERFF must contain all On-Exchange plan IDs with complete data. Do not include Off-Exchange plan IDs (e.g. Off-Exchange-only Certified SADPs).**

SERFF issuers required to resubmit a Transparency in Coverage Template as the result of a submission error for any reason must resubmit ALL On-Exchange plan IDs and data in the resubmitted template as if it were a new QHP Certification application. Resubmitted templates that only include missing or corrected plan IDs will overwrite their originally submitted template in the CMS system and result in a submission error.

Example:

An issuer's Transparency in Coverage Template is missing one of the plan IDs in the Plans & Benefits Template, which results in a submission error. In an attempt to resolve the issue, the issuer creates a new Transparency in Coverage Template that includes only the missing plan ID. This will result in another submission error because the Transparency in Coverage Template still does not include all of the plan IDs in the Plans & Benefits Template. In order to resolve the error, the issuer's Transparency in Coverage Template must include all of the plan IDs in the Plans & Benefits Template, not just those reported as receiving errors in the last submission. Once an issuer completes the Transparency in Coverage Template per these instructions, a copy must be placed in each binder and then the entire QHP Certification Application will need to be resubmitted via SERFF.

4. Transparency in Coverage Submissions via HIOS

To successfully submit the Transparency in Coverage Template via HIOS, the Plan Level Data tab (second tab) of the Transparency Template must include all On-Exchange PY2021 plan IDs submitted in the Plans & Benefits Template. Do not include Off-Exchange-only plan IDs (e.g. Off-Exchange-only Certified SADPs). The CMS validation system will reject the Transparency in Coverage template if the On-Exchange plan IDs do not exactly match those in the Plans & Benefits Template.

We understand that transfer errors may delay the final submission of data. CMS will work with issuers and states that try to meet the initial deadline to ensure that all data is submitted for review.

- **Transparency templates that are resubmitted via HIOS must contain all On-Exchange plan IDs with complete data. Do not include off-Exchange plan IDs (e.g. Off-Exchange-only Certified SADPs).**

Issuers required to resubmit a Transparency in Coverage Template as the result of a submission error for any reason must resubmit ALL On-Exchange plan IDs and data in the resubmitted template as if it were a

new QHP Certification application. Resubmitted templates that only include missing or corrected plan IDs will overwrite their originally submitted template in the CMS system and result in another submission error.

Example:

An issuer's Transparency in Coverage Template is missing one of the On-Exchange plan IDs in the Plans & Benefits Template, which results in a submission error. In an attempt to resolve the issue, the issuer creates a new Transparency in Coverage Template that includes only the missing plan ID. This will result in another submission error because the Transparency in Coverage Template still does not include all of the On-Exchange plan IDs in the Plans & Benefits Template. In order to resolve the error, the issuer's Transparency in Coverage Template must include all of the On-Exchange plan IDs in the Plans & Benefits Template, not just those reported as receiving errors in the last submission.

5. Submitting a Transparency in Coverage URL (SERFF and HIOS)

- **All issuers must provide a Transparency in Coverage URL in the HIOS Supplemental Submission Module (SSM) upon initial QHP Application submission.**

All on-Exchange issuers applying for PY20201 QHP certification must submit a compliant, working, and active Transparency in Coverage URL upon initial QHP Application submission in the HIOS SSM.

All off-Exchange only issuers, including off-Exchange Stand-alone Dental Plans (SADPs), should submit the dummy URL "http://temporary.url" in the HIOS SSM. Additional information can be found on page 2E-14 of the [QHP Application Instructions](#). For all other issuers with a Transparency in Coverage URL requirement, please note that CMS is no longer accepting dummy URLs as a placeholder for Early Bird and Round 1 QHP Application submission.

- **Issuers submitting via SERFF must submit their Transparency data prior to submitting their Transparency in Coverage URL.**

Issuers that submit QHP templates in SERFF must have their state transfer the data to CMS before they will be able to access the SSM to submit their Transparency in Coverage URL information. States should be mindful of transferring issuer data in a timely manner to avoid submission delays.