

# TOOLKIT

## QHP Certification

Health Insurance Marketplace

### PY2023 QHP Certification Issuer Toolkit

Last Updated: April 25, 2022

The PY2023 QHP Certification Issuer Toolkit consolidates important information about the PY2023 QHP Application, and includes lists of tasks for issuers to complete throughout each step of the QHP Application submission and certification process. These checklists include information on relevant deadlines, next steps once review results are shared, and important reminders for completing actions required for certification. CMS has also provided links to additional resources throughout this document that issuers should access for more information on each topic. This toolkit is a supplemental resource and is not intended to replace official guidance or instructions. Acronyms used throughout are defined in [Appendix A](#).

If you have questions about QHP Application submission or certification at any point, contact the MSD at 855-CMS-1515 or [CMS\\_FEPS@cms.hhs.gov](mailto:CMS_FEPS@cms.hhs.gov).

1 2 3 4 5 6 7

PY2023 QHP Data Submission and Certification Timeline	Application Initiation	Application Material Requirements (by Deadline)	Application Submission	Data Changes and Corrections	Certification Preparedness	Appendices
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Qualified Health Plan



Health Insurance Marketplace

## How to Use This Resource

While CMS encourages all issuers seeking certification to review this resource in its entirety prior to initiating a QHP Application, each section is relevant and applicable to specific stages of the QHP certification process. This toolkit is designed to allow issuers to identify important action items and expectations, including which materials to submit for each submission deadline. Save a local copy of the toolkit to your computer and check off activities as you complete them throughout the application submission and certification process.

Once you have initiated your QHP Application(s), reference the below toolkit sections, as needed.

### APPLICATION MATERIAL REQUIREMENTS

Find the relevant QHP Application submission deadline and review which materials are required for each submission deadline, by state Exchange type and plan type (QHP/SADP).



### APPLICATION SUBMISSION

Before you submit application materials, confirm you have used the available QHP Application review tools, have followed all submission steps to submit your application data to CMS, and have checked your submission status.



### DATA CHANGES AND CORRECTIONS

Learn how to access your review results in the PM Community and make all CMS-directed corrections. If you would like to make other data changes, review which data changes are permitted and follow the required steps to submit a data change request.



### CERTIFICATION PREPAREDNESS

Review all actions you need to take prior to certification, including using Plan Preview to identify plan errors, completing final issuer plan confirmation, signing your QHP Agreement, and downloading your countersigned QHP Agreement.



### Technical Assistance

- Register for a [REGTAP](#) account.
- Register for QHP issuer webinars.
- Verify your email IT settings.
  - Add CMS email addresses to your email contact lists, and work with your IT support staff to whitelist IP address 136.147.180.31.
- If you have questions, contact your [Account Manager](#) (*on-Exchange issuers only*).
  - New issuers can contact the [MSD](#) to be assigned an Account Manager.



**Action Required!** This icon appears throughout the toolkit, prompting you to review the relevant checklist(s) and take necessary actions.



**Technical Assistance Available!** This icon appears throughout the toolkit when a technical assistance video exists to reference for further guidance.



Resources  
Linked

Click this icon to be directed to other published resources.



**CMS Recommends...**

Reference these callouts for best practices and helpful reminders.



**SERFF Tips**

Reference these callouts for suggestions that are specific to issuers in states performing plan management functions and SBE-FPs submitting in SERFF.



# 1. PY2023 QHP Data Submission and Certification Timeline

Below is the PY2023 QHP Data Submission and Certification Timeline, as outlined on the [Timeline webpage](#) of the QHP certification website; issuers seeking QHP certification on the FFEs should reference this timeline and the applicable checklists to understand QHP data submission requirements for certification. **Click on any activity to be directed to the applicable checklist.**

Activity	Dates
QHP Application submission window opens	4/21/22
<b>Early Bird Application Deadline:</b> Optional Early Bird deadline for issuers to submit QHP Applications to CMS	5/18/22
CMS reviews Early Bird QHP Application data and releases results in the PM Community for issuers and states to review	5/19/22 – 6/10/22
HHS-approved QHP Enrollee Survey vendor securely submits the QHP Enrollee Survey response data to CMS on behalf of the QHP issuer <sup>1</sup>	5/20/22
QHP issuer submits the validated QRS clinical measure data, with attestation, to CMS via NCQA’s IDSS <sup>2</sup>	6/15/22
<b>Initial Application Deadline:</b> Initial deadline for issuers to submit QHP Applications to CMS, including machine-readable index URLs and Plan ID Crosswalk data	6/15/22
CMS reviews initial QHP Applications and releases results in the PM Community for issuers and states to review	6/16/22 – 7/15/22
<b>Secondary Application Deadline:</b> Deadline for issuers to submit their QHP Application Rates Table Templates to CMS; optional deadline for issuers to submit corrected QHP Application data to CMS	7/20/22
CMS reviews Rates Table Template data and resubmitted QHP Application data, and releases results in the PM Community for issuers and states to review	7/21/22 – 8/12/22
QHP issuers, Exchange administrators, and CMS preview the 2022 QHP quality rating information	August/September 2022
<b>Issuer Plan Confirmation/Crosswalk Deadline:</b> Issuers complete final plan confirmation and submit final Plan ID Crosswalk Templates in the PM Community	8/10/22 – 8/24/22
<b>Final Application Deadline:</b> Deadline for issuers to submit changes to their QHP Applications and to submit marketing URL data in the HIOS SSM	8/17/22
CMS reviews QHP Applications and releases results in the PM Community for issuers and states to review	8/18/22 – 9/12/22
CMS sends QHP Certification Agreements to issuers	9/13/22
<b>QHP Agreement Signing Deadline:</b> Issuers return signed QHP Certification Agreements to CMS	9/13/22 – 9/21/22
<b>State Plan Confirmation Deadline:</b> States complete final plan confirmation in the PM Community	9/13/22 – 9/21/22
Limited data correction window	9/15/22 – 9/16/22
<b>Machine-Readable/URL Deadline:</b> Deadline for issuers’ machine-readable data to be posted and marketing URLs to be live and active	9/21/22
CMS releases certification notices to issuers and states	10/4/22 – 10/5/22
Anticipated public display of QHP quality rating information	11/1/22
Open Enrollment begins	11/1/22

<sup>1</sup> QRS and QHP Enrollee Survey Technical Guidance for 2022, available [here](#).

<sup>2</sup> Each QHP issuer must submit and plan-lock its QRS clinical measure data by June 1 to allow the HEDIS® Compliance Auditor sufficient time to review, approve, and audit-lock all submissions by the June 15 deadline. There are no fees for QHP issuers associated with accessing and using the IDSS.

## 2. Application Initiation

Issuers seeking QHP certification should follow the steps below to prepare for QHP Application submission.



### Review Resources Available to Issuers

- Download and review** the resources posted to the [QHP certification website](#), including [application materials](#), [instructions](#), training videos, [review area descriptions](#), [published guidance](#), and system user guides.



### Confirm Submission System Access

- Contact your state** to confirm the appropriate state Exchange model type ([Appendix B](#)) and submission system. Visit the [State Exchange Models](#) and [Submission Systems](#) webpages for additional information.
- Obtain HIOS access.**
  - Review [HIOS User Guides](#).
  - Get standard component IDs, or “plan IDs.”
  - Update HIOS user roles and administrative data.
  - Obtain access to the required QHP and URR modules.
- Obtain SERFF access**, if needed.

- Issuers in states performing plan management functions and SBE-FPs submit their QHP Applications via SERFF; issuers in FFE states should confirm with their state whether they are required to obtain SERFF access.
  - Issuers in states with an effective rate review program can submit rate filing information through the new URR Tab of SERFF. This does not apply if your state does not have SERFF filing access.
  - Contact [NAIC](#) or the [SERFF Plan Management Help Desk](#) for support.



#### CMS Recommends...

Setting periodic reminders to regularly check your parent organization’s PM Community contact list for needed updates.



### Confirm PM Community Access

- Ensure at least two members** of your parent organization have [PM Community](#) access.
  - Email the [MSD](#) to request access, if needed.
    - Parent organizations with issuers that offer QHPs are able to request access for up to five users; those whose issuers offer only SADPs can request access for up to four users.
  - Review the contact list in the PM Community for any needed updates. Reference the [Register for Updates webpage](#) for more information on managing PM Community contacts.
  - Review guidance posted to the PM Community homepage’s Resources and Training tab, including user guides, training videos, and FAQs.



*A **Managing Contacts** video is available on the Resources and Training tab of the PM Community homepage.*



### Verify Exchange Requirements

- Verify [accreditation](#) standards** are met for all issuers in your parent organization.



### 3. Application Material Requirements (by Deadline)

This section provides checklists of materials required for each QHP Application submission deadline in the [timeline](#); each checklist denotes which materials are required for each Exchange type (FFE, state performing plan management functions, or SBE-FP), as well as plan type (QHP or SADP). Issuers in states performing plan management functions and SBE-FPs are encouraged to work with their states to determine any state-specific application submission requirements and deadlines.

You may be required to submit additional justifications or supporting documents not listed in the checklists in this section, depending on your issuer's specific circumstance. Visit the [Application Materials](#) webpages of the QHP certification website to download the requisite materials and detailed instructions for each portion of the QHP Application, including any supporting documents and justification forms that may be required. A full list of materials and the appropriate submission system for each can be found in [Appendix C](#).



*QHP Application Template videos are available in the Application Resources section of each corresponding Application Materials webpage.*

Click the links below to be directed to the appropriate checklist:



#### Early Bird Deadline

5/18/2022



#### Initial Deadline

6/15/2022



#### Secondary Deadline

7/20/2022



#### Final Deadline

8/17/2022

Once you are ready to submit your application, refer to the [Application Submission checklist](#) of this toolkit.



## Early Bird Deadline Application Material Checklist

The Early Bird review round is optional for issuers seeking QHP certification. Issuers that choose to participate must submit the required materials outlined below by the Early Bird submission deadline in the [timeline](#). CMS will conduct a limited number of reviews on the data submitted and release review results to issuers and states prior to the required initial application submission deadline, offering issuers an additional opportunity to review and make corrections.

Use the table below and the [Application Submission checklist](#) to submit QHP Application data for the Early Bird deadline of 5/18/22.

Materials: Reference <a href="#">Appendix C</a> for information on where to submit materials	Issuers in FFEs		Issuers in states performing plan management functions		Issuers in SBE-FPs	
	QHP	SADP	QHP	SADP	QHP	SADP
Accreditation Questions	✓	N/A	N/A	N/A	N/A	N/A
Business Rules Template	✓	✓	✓	✓	✓	✓
ECP/Network Adequacy Template	✓	✓	✓	✓	N/A	N/A
Interoperability Attestation and Justification Form	✓	N/A	✓	N/A	N/A	N/A
Issuer Marketplace Information Administrative Data	✓	✓	✓	✓	✓	✓
Network ID Template	✓	✓	✓	✓	✓	✓
Plans & Benefits Template	✓	✓	✓	✓	✓	✓
Prescription Drug Template	✓	N/A	✓	N/A	✓	N/A
Program Attestations	✓	✓	✓	✓	N/A	N/A
SADP AV Supporting Documentation	N/A	✓	N/A	✓	N/A	✓
SADP Description of EHB Allocation	N/A	✓	N/A	✓	N/A	✓
Service Area Template	✓	✓	✓	✓	✓	✓
Transparency in Coverage Template & URL	✓	✓	✓	✓	✓	✓
Plan ID Crosswalk Template and State Authorization <i>(PY2022-certified issuers only)</i>	Optional	Optional	Optional	Optional	Optional	Optional
Rates Table Template	Optional	Optional	Optional	Optional	Optional	Optional



## Initial Deadline Application Material Checklist

Issuers seeking QHP certification must submit their QHP Application(s) to CMS by the initial submission deadline (“initial deadline”). These applications must include **all plans** the issuer is considering offering for the upcoming plan year; new plans will not be accepted after this deadline.

- Use the [Data Changes and Corrections checklist](#) to make required corrections from the Early Bird review round (if applicable).
- Use the table below and the [Application Submission checklist](#) to submit QHP Application data for the initial deadline of 6/15/22.

Materials: Reference <a href="#">Appendix C</a> for information on where to submit materials	Issuers in FFEs		Issuers in states performing plan management functions		Issuers in SBE-FPs	
	QHP	SADP	QHP	SADP	QHP	SADP
Accreditation Questions	✓	N/A	N/A	N/A	N/A	N/A
Business Rules Template	✓	✓	✓	✓	✓	✓
ECP/Network Adequacy Template	✓	✓	✓	✓	N/A	N/A
Interoperability Attestation and Justification Form	✓	N/A	✓	N/A	N/A	N/A
Issuer Marketplace Information Administrative Data	✓	✓	✓	✓	✓	✓
Machine-Readable Index URL	✓	✓	✓	✓	✓	✓
Network ID Template	✓	✓	✓	✓	✓	✓
Plan ID Crosswalk Template and State Authorization ( <i>PY2022-certified issuers only</i> )	✓	✓	✓	✓	✓	✓
Plans & Benefits Template	✓	✓	✓	✓	✓	✓
Prescription Drug Template	✓	N/A	✓	N/A	✓	N/A
Program Attestations	✓	✓	✓	✓	N/A	N/A
QIS Form	✓	N/A	✓	N/A	N/A	N/A
SADP AV Supporting Documentation	N/A	✓	N/A	✓	N/A	✓
SADP Description of EHB Allocation	N/A	✓	N/A	✓	N/A	✓
Service Area Template	✓	✓	✓	✓	✓	✓
Transparency in Coverage Template & URL	✓	✓	✓	✓	✓	✓
Rates Table Template	Optional	Optional	Optional	Optional	Optional	Optional



## Secondary Deadline Application Material Checklist

Issuers seeking QHP certification must submit their rates data to CMS by the initial Rates Table Template submission deadline, or “secondary deadline.” Reference the [Rate Review Requirements \(by Deadline\) checklist](#) for additional information on rate review submission. While issuers are required to submit the Rates Table Template, the SBC Form, Formulary Directory, and URR data, if applicable, to CMS by the secondary deadline, CMS also encourages issuers to review the results released in the PM Community thus far and submit corrected application data by this deadline. CMS will conduct additional QHP certification and data integrity reviews on revised QHP Applications that are submitted by the secondary deadline, and will post additional review results in the PM Community prior to the final submission deadline, providing issuers with an additional opportunity to review and make corrections.

- Use the [Data Changes and Corrections checklist](#) to make required corrections from the initial review round.
- Confirm that the EHB % of total premium value in the Plans & Benefits Template is accurate based on the relevant data entered in the URR Template.
- Use the table below and the [Application Submission checklist](#) to submit required materials and corrected QHP Application data for the secondary deadline of 7/20/22.

Materials: Reference <a href="#">Appendix C</a> for information on where to submit materials	Issuers in FFEs		Issuers in states performing plan management functions		Issuers in SBE-FPs	
	QHP	SADP	QHP	SADP	QHP	SADP
Actuarial Memorandum	✓	N/A	✓	N/A	✓	N/A
Formulary Directory	✓	N/A	✓	N/A	✓	N/A
URR Template	✓	N/A	✓	N/A	✓	N/A
Rates Table Template	✓	✓	✓	✓	✓	✓
SBC Form	✓	N/A	✓	N/A	✓	N/A
All Other Application Materials	Optional	Optional	Optional	Optional	Optional	Optional



## Final Deadline Application Material Checklist

Issuers are required to finalize all application data by the final submission deadline (“final deadline”). With the exception of URL data, which is a required submission for all issuers by the final deadline, issuers are only required to resubmit other application materials if the issuer has made changes to its data to address CMS-required corrections. After the final deadline, issuers will only make corrections directed by CMS or by their state. Issuers whose applications are not accurate after the final submission deadline, and are then required to resubmit corrected data during the limited data correction window, may be subject to compliance action by CMS.

- Use the [Data Changes and Corrections checklist](#) to make required corrections from the secondary review round.
- Use the table below and the [Application Submission checklist](#) to submit required materials and corrected QHP Application data for the final deadline of 8/17/22.

Materials: Reference <a href="#">Appendix C</a> for information on where to submit materials	Issuers in FFEs		Issuers in states performing plan management functions		Issuers in SBE-FPs	
	QHP	SADP	QHP	SADP	QHP	SADP
Marketing URLs	✓	✓	✓	✓	✓	✓
All Other Application Materials	<i>Required if corrections are identified by CMS</i>					

## 4. Application Submission



### Use the QHP Application Review Tools

CMS provides a number of review tools issuers can use to check their plans for QHP Application errors that would require corrections following submission.



#### Review Tools Webpage

- Download** the applicable review tools.
- Import** your application templates into each tool.
- Make application corrections** based on any errors identified.



*QHP Application Review Tool videos are available on the Review Tools webpage.*



#### CMS Recommends...

Submitting completed parts of your application as soon as possible; do not wait until the deadline to submit application data.



### Submit Your Application

Once you have completed all necessary application materials and have run the review tools, follow the steps below to ensure your application and Plan ID Crosswalk Template are properly submitted to CMS for each application submission deadline. Reference the [Application Submission webpage](#) of the QHP certification website for additional information. Issuers submitting [URLs](#), [machine-readable data](#), [URR data](#), and [administrative data](#) should refer to the relevant instructions for guidance on submission.

#### Issuers in FFEs



#### HIOS User Guides

- Upload** materials to the applicable HIOS modules.
- Validate** each module.
- Cross validate** your application.

*Cross validation is only required for the secondary and final deadlines. Be sure to return to the Final Submission tab, click "Cross Validate," and click "Submit."*



#### SERFF Tips

Upload only one version of the Business Rules, Network ID, Service Area, and Transparency in Coverage Templates to all SERFF binders to avoid template overwrite issues.

#### Issuers in States Performing Plan Management Functions & SBE-FPs



#### SERFF Website

- Upload** materials to the applicable SERFF binders.
- Confirm** in SERFF that your state has transferred the most recent data for all plans to CMS.

*Issuers that make changes to their SERFF binders after their initial submission should work with their state to ensure successful retransfer of the updated data.*

#### PY2022-Certified On-Exchange Issuers



#### Plan ID Crosswalk Instructions

- Submit** your completed Plan ID Crosswalk Template and state authorization to CMS via the Plan ID Crosswalk Submission tab in the PM Community.



*A **Submitting a Plan ID Crosswalk Template** video is available on the Resources and Training tab of the PM Community homepage.*





## Check Your Submission Status

### PM Community User Guide

Follow the steps below to check your application submission status in the PM Community for each deadline; please allow up to 48 hours for CMS to update this status after you have completed submission.

#### All Issuers

#### SERFF Tips

SERFF issuers should check with their state to ensure the state has transferred all SERFF binders before each deadline.

- Log into the [PM Community](#) and navigate to the Issuers tab.
- Select the relevant issuer ID/plan year combination; issuers may filter by plan year, if desired.
  - **Off-Exchange SADP and All New PY2023 Issuers:** If you are not able to locate the issuer ID for the current plan year, CMS has not received your QHP Application.
  - **PY2022-Certified On-Exchange Issuers:** If no plan IDs appear for the issuer/plan year combination, CMS has not received your QHP Application.
- Locate the “**Certification**” status.
  - **Early Bird and Initial Deadlines:** This status should read either “Pending Review” or “Pending Review and Submission of Rates.”
    - If the status is blank, CMS has not received a QHP Application for this issuer.
    - If the status reads “Not Eligible for CMS Certification,” the issuer’s application is incomplete and/or not eligible for CMS review or QHP certification.
  - **Secondary and Final Deadlines:** This status should read “Pending Review.”
    - If the status reads “Pending Review and Submission of Rates” for the secondary deadline, CMS has not received a Rates Table Template for this issuer.
    - If the status reads “Not Eligible for CMS Certification,” the issuer’s application is not eligible for CMS review or QHP certification.
- Confirm the “**Application Last Updated/Transferred**” date in the “Submission Details” section matches the most recent date on which you submitted your application or the date on which your state transferred this data to CMS.

#### Issuers in FFEs

- Locate the “**Application Last Cross Validated**” date in the “Submission Details” section to confirm that your application was successfully cross validated in HIOS.
  - While cross validation for the Early Bird and initial deadlines is optional, **you must cross validate your application for the secondary and final deadlines** in order for CMS to receive the most up-to-date information that was submitted.
  - If the date displaying in this field is not as expected, log into HIOS and follow the steps outlined above to cross validate your application.

#### PY2022-Certified On-Exchange Issuers

- Log into the [PM Community](#) and navigate to the Plan ID Crosswalk Submission tab.
- Click on the relevant entry (begins with “CT-”) and **confirm the status is “Submitted.”** If the entry is still in a “New” status, click “Submit Template” in the top right corner to complete submission.



## 5. Data Changes and Corrections

### Data Change Windows Webpage

CMS conducts reviews during the certification process to identify areas of non-compliance with regulations or data integrity errors. After each review is complete, issuers have the opportunity to correct application data and may be invited to join a technical assistance call with CMS; CMS’s technical assistance outreach recommendations for each required correction are displayed in the PM Community.

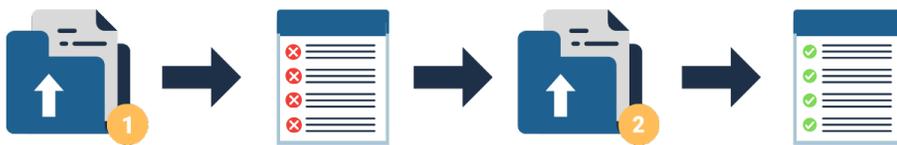
	Permitted with No State or CMS Authorization Required	Permitted with Authorization <sup>3</sup>	Not Permitted
<b>Before the Initial Deadline</b>	All data changes permitted.	N/A	N/A
<b>Between the Initial and Final Deadlines</b>	All changes are permitted, including changes in response to CMS-identified corrections, except where noted.	N/A	Issuers may not: <ul style="list-style-type: none"> <li>• Add new plans;</li> <li>• Change an off-Exchange plan to be both on- and off-Exchange;</li> <li>• Change plan type(s) or market type(s); or</li> <li>• Change QHPs, excluding SADPs, from a child-only plan to a non-child-only plan.</li> </ul>
<b>After the Final Deadline</b>	N/A	Issuers may request critical data changes to align with state filings. URLs may be changed with state authorization; CMS authorization is not required.	Issuers may not change certified QHP data without the explicit direction and authorization of CMS and the state.

### Rolling and Round-Based Reviews

Throughout the QHP Application submission process, CMS releases review results to issuers in the PM Community for each review round. As reviews are completed, CMS will update the PM Community with new review results and notify issuers and their states. Review areas are grouped into two categories: **rolling** and **round-based**.

**Rolling Review Areas:** Results for these review areas are shared on daily basis throughout a given review cycle, unless otherwise noted. After the initial and secondary deadlines, the daily results release will be paused for approximately one week. CMS will notify issuers and states once the rolling review results release process resumes after each of these deadlines.

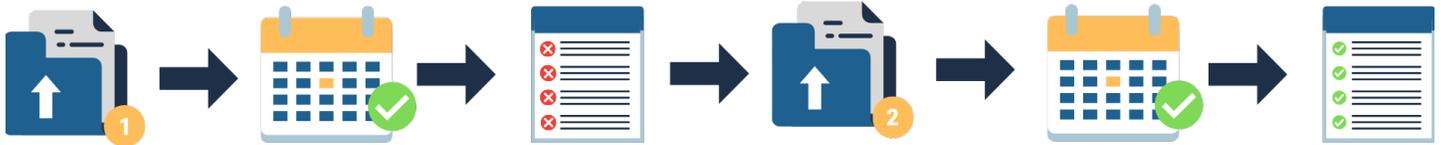
For the Transparency in Coverage URLs, CMS will release review results daily after the Early Bird deadline through Open Enrollment. For the Machine-Readable Index URLs, CMS will release review results daily after the initial submission deadline through Open Enrollment. For the Marketing URL (Plan Brochure, Formulary, SBC, Network) Functionality review areas, CMS will release review results daily after the final submission deadline through Open Enrollment. After Open Enrollment concludes, reviews will be performed if a new URL is submitted.



<sup>3</sup> Required authorization to change QHP data, and the process for requesting authorization, differs by state Exchange type.

Rolling review areas for PY2023 include **CSR – Plan Variation, Data Integrity, Standardized Options, Dental MOOP, Silver/Gold, Machine-Readable Index URLs, Transparency in Coverage URLs, and Marketing URL (Plan Brochure, Formulary, SBC, Network) Functionality.**

**Round-Based Review Areas:** Results for these review areas are shared once per review round during which a review is conducted; issuers and states receive email notifications when new round-based review results are available. Review areas are considered round-based review areas unless otherwise specified.



The [QHP Application Corrections webpage](#) includes additional information about rolling and round-based review areas, including a description of each review area.



## Access Your Review Results and Make Required Corrections

### Common Issuer Corrections Guidance

Review the [QHP Application Corrections webpage](#) to determine which reviews are conducted (1) for each Exchange type, (2) on a rolling basis, and (3) during each review round.

Review the email blast from “CCIIO Memos” for the following information:

- The review “as of” date.
  - For round-based review areas, CMS conducts reviews on application data submitted as of the most recent application submission deadline, and releases review results within a few weeks of each deadline; for rolling review areas, CMS conducts reviews on application data as it is submitted, and releases review results within 1-2 business days after data submission/transfer. It is possible for an issuer to submit updated data in HIOS/SERFF *after* CMS has started its review. Please take the “as of” date into consideration when reviewing corrections.
- Whether new review results have been released for your state Exchange type.
  - CMS conducts different reviews for each state Exchange type (FFE, state performing plan management functions, and SBE-FP).
- Any next steps the issuer should take in response to the corrections released.

Log into the [PM Community](#) and access review results in either the Corrections tab or Issuers tab.



*A [Reviewing Corrections](#) video is available on the Resources and Training tab of the PM Community homepage.*

Make the required corrections to your QHP Application.

### Early Bird, Initial, and Secondary Review Round Corrections

- Update the relevant application materials and resubmit them to CMS as soon as possible, but by no later than the next deadline.



### Final Round Corrections

- Update the relevant application materials and confirm whether you are required to enter the LDCW or another submission window, as directed by CMS.

### SERFF Tips

SERFF issuers with required corrections should work with their states to make sure updated binders are transferred ahead of the next deadline.

## Requesting Data Changes After the Final Deadline

### DCR Instructions

Issuers in FFE states and states performing plan management functions must submit a DCR if application data changes that are not identified by CMS are needed after the final deadline. Issuers in SBE-FP states should contact their states if application changes are needed after the final deadline.

Issuers with inaccurate applications after the final QHP Application submission deadline may be subject to compliance action by CMS. Issuers that request to make changes that affect consumers may have their plans suppressed from display on HealthCare.gov until the data is corrected and refreshed for consumer display. CMS may also determine that certain changes require an SEP if the applicable benefit is not honored as originally sold to enrollees.



A *Submitting a DCR* video is available on the Resources and Training tab of the PM Community homepage.



## 6. Certification Preparedness

### Plan Preview

 **Plan Preview Webpage**

HIOS Module that allows issuers to view plan data as it would display to consumers in Plan Compare on



Issuers are encouraged to use Plan Preview during the QHP Application period to make sure plans are displaying as intended, including accuracy of all URLs.



PY2023 Plan Preview will be available by April 2022 and can be used as a resource for issuers throughout the plan year.



All issuers in FFE states may use Plan Preview as soon as it is open. Issuers that submit data in SERFF only see data in Plan Preview that their state has transferred to HIOS.



The [Plan Preview webpage](#) provides several resources, including a user guide with instructions for using the Plan Preview Module in HIOS and a Plan Preview training video.



#### Use Plan Preview to Identify Plan Errors

- Access the Plan Preview Module via HIOS.
- Enter sample rating scenarios to view details and rates for associated Individual and SHOP plans.
  - Only plans that have been submitted in HIOS or transferred via SERFF will display.
- Notify CMS immediately if issues are identified. Issuers will also have a chance to review their plan data during issuer testing.

### Quality Data

 **MQI Website**

QHPs are rated based on relative quality and price; quality rating information is publicly displayed for all Exchange types to assist in consumer selection of plans. QHP issuers are required to submit quality rating information as a condition of certification and participation in the FFE.

QRS/QHP Enrollee Survey Deadlines for Issuers	Dates
QHP issuer contracts with a HEDIS Compliance Organization (NCQA-licensed) for validation of the QHP Enrollee Survey sample frame and the QRS clinical measure data.	October 1, 2021
QHP issuer contracts with an HHS-approved QHP Enrollee Survey vendor to conduct the QHP Enrollee Survey and submit survey response data to CMS.	January 28, 2022
QHP issuer and HEDIS Compliance Auditor (employee of or contracted by the HEDIS Compliance Organization) complete validation of QHP Enrollee Survey sample frame.	January 28, 2022
HHS-approved QHP Enrollee Survey vendor securely submits the QHP Enrollee Survey response data to CMS (on behalf of the QHP issuer).	May 20, 2022
QHP issuer submits the validated QRS clinical measure data, with attestation, to CMS via NCQA's IDSS.	June 15, 2022
QHP issuers preview the 2022 QHP quality rating information.	August/September 2022

## Rate Review Requirements (by Deadline)

### URR Instructions

All QHP issuers are required to undergo rate review. Issuers should reference the below federal deadlines and check with their state regulators to confirm the state has not instituted any earlier deadlines. Depending on their specific circumstances, issuers may be required to submit additional justifications or supporting documents not listed below. QHP issuers should verify that they have the following:

- Access to the URR module of HIOS;
- The most recent version of the URR Template; and
- The most recent version of the URR Template Instructions.

Activity	Dates
Submission deadline for issuers in OK and WY to submit proposed rate filing justifications to CMS.	June 1, 2022
Submission deadline for issuers in all other states and the District of Columbia to submit proposed rate filing justifications to CMS.	July 20, 2022
Deadline for QHP issuers in states with an Exchange served by the HealthCare.gov platform to submit final rate filing justifications to CMS.	August 17, 2022
Deadline for QHP issuers in states with a State-based Exchange that does not use the HealthCare.gov platform to submit final rate filing justifications to CMS.	October 17, 2022

Issuers are now able to submit the URR Template directly in SERFF; a rate filing that is filed through SERFF and automatically uploaded to the URR Module of HIOS will be considered filed with CMS. This new transfer method will not apply to states that do not have an effective rate review program and states that do not have access to SERFF. Those issuers will continue to submit rate filings directly into HIOS. States that can access SERFF, and states with an effective rate review program, are required to file the PY2023 URRT in SERFF; this includes issuers in states that do not perform plan management functions and otherwise submit QHP application data in HIOS.

## Final Issuer Plan Confirmation

### PM Community User Guide

As part of the QHP certification process, issuers must complete plan confirmation to submit their final plan offering decisions to CMS. During the plan confirmation window specified in the [timeline](#), issuers should review the list of plans loaded in the PM Community and confirm which plans should be made available through the Exchange. Issuer plan confirmation is the final opportunity for issuers to notify CMS of plan withdrawals. The deadline to complete issuer plan confirmation is also the deadline to submit final Plan ID Crosswalk Templates to CMS in the PM Community.

 A *Completing Issuer Plan Confirmation* video is available on the *Resources and Training* tab of the PM Community homepage.

### Complete Final Issuer Plan Confirmation

- Log into the [PM Community](#) during the final issuer plan confirmation window.
- View PY2023 plans requiring confirmation by using the available filters to narrow down the visible list of plans. Ensure a selection is made for all plans requiring confirmation before the deadline.
- Confirm all desired plans. Issuers have the option to:

### CMS Recommends...

Selecting “Download Plans List” at the top of the screen to export your plan list if needed. This feature is available to issuers at any time—not just during plan confirmation.

- Confirm all plans at once;
- Confirm multiple, but not all, plans at once; or
- Confirm a single plan ID at a time.

Click **“Save”** after confirming the desired plans. If this step is not performed, users’ responses will not be shared with CMS.

CMS will email issuers the first day of the issuer plan confirmation window with more detailed instructions; you can also reference the PM Community User Guide posted on the Resources and Training tab of the PM Community homepage for additional instructions.

Following final issuer plan confirmation on the dates specified in the [timeline](#), state contacts will use the PM Community to finalize the list of plans in their state that are eligible for availability through the Exchange during the upcoming plan year. Final state plan confirmation gives regulators the chance to indicate whether the state does or does not approve the regulatory submissions of each plan for certification on the Exchange.

## QHP Agreement Signing

Issuers offering on-Exchange QHPs or SADPs must sign and submit a QHP Certification Agreement and Privacy and Security Agreement (“QHP Certification Agreement”) and a Senior Officer Acknowledgement.



**The QHP Certification Agreement** includes provisions for safeguarding plan and participant privacy and standards for issuer testing before Open Enrollment starts. The agreement must be signed by an officer of the legal entity who has legal authority to contractually bind the issuer.



**The Senior Officer Acknowledgement** confirms that a senior officer of the issuer has knowledge of the content of the issuer’s plans, as well as the content of the completed attestations and the Letter to Issuers.



### Complete the QHP Agreement Signing Process

Once you receive your agreement via DocuSign, take **one** of the following actions:

- Complete signing the agreement (authorized users only):**
  - Click “Review Documents.”
  - Review the QHP Certification Agreement, enter the appropriate information where indicated, and click “Sign” to provide your e-signature via DocuSign.
  - Review the Senior Officer Acknowledgement, enter the appropriate information where indicated, and click “Sign” to provide your e-signature via DocuSign.
  - Click “Finish” at the top or bottom of the screen.
- Assign the agreement to an authorized user to sign:**
  - Click “Review Documents.”



### CMS Recommends...

Completing the following activities **before** CMS sends QHP Agreements:

1. Log into the [PM Community](#) and confirm that your organization contacts are correctly listed. Users are encouraged to keep contacts in the PM Community up to date, so that relevant members receive the appropriate communications.
2. Attend the QHP Certification Agreement webinar. Issuers that have not already registered for the QHP Webinar Series should register via [REGTAP](#).
3. Watch the [QHP Certification Agreement Signing Process instructional video](#) for additional guidance.



- Click “Other Actions” and select “Assign to Someone Else” from the dropdown menu.
- Enter the email address and name of the authorized user, and the reason for reassigning the document.
- Click “Assign to Someone Else.”

All original email recipients and authorized users will receive PDF copies of the documents once they have been signed.

## URL Submission



CMS requires issuers to submit URL data for the plans they intend to offer on the Exchange. Consumers should be able to view the relevant information at each URL without logging in, clicking through multiple webpages, or creating accounts, memberships, or registrations.



### Submit URLs

- Submit URLs by the deadlines outlined in the table below.** The table also includes where each URL is submitted and the date by which the URL needs to be live and active for the 2023 plan year.

URL Type	Submission Location	Submission Deadline	Live and Active Deadline
Transparency in Coverage	SSM	June 15, 2022*	Upon URL Submission
Marketing (SBC, Plan Brochure, Payment, Formulary, Network)	SSM	August 17, 2022	September 21, 2022
Machine-Readable Index.JSON	SSM	June 15, 2022	September 21, 2022

*\*If you choose to submit a QHP Application for the Early Bird review round, Transparency in Coverage URLs are required by the Early Bird submission deadline, 5/18/22.*

While CMS may conduct reviews on marketing URLs submitted by August 17, 2022, all marketing URLs **must** be active and route consumers directly to the relevant information for their standard plan or plan variant by the time you have signed your issuer’s QHP Agreement.

## SBC Form Submission

CMS requires issuers to submit SBC URLs for all plans they intend to offer on the Exchange. Beginning in PY2023, CMS also requires issuers to submit their SBC Forms in the HIOS SSM for all plans they intend to offer on the Exchange; issuers must submit their SBC Forms by the secondary submission deadline.

Issuers offering health insurance coverage on the Exchange must provide applicants, enrollees, and policyholders with an accurate SBC. Issuers are required to provide the SBC in a manner compliant with the standards set forth in 45 CFR 147.200, which implements section 2715 of the Public Health Service Act, as added by the PPACA. Specifically, issuers must fully comply with the requirements of § 147.200(a)(3), which requires issuers to “provide an SBC in the form, and in accordance with the instructions for completing the SBC, that are specified by the Secretary in guidance.”

CMS reviews SBCs to ensure that they contain accurate issuer marketing information for consumers and that there are no inaccuracies when compared to data within an issuer’s submitted QHP Application. CMS will perform reviews on the SBC Forms following the secondary submission deadline, and release review results in the PM Community.



## Formulary Directory Submission

CMS requires issuers to submit plan marketing URLs, including Formulary URLs, for the plans they intend to offer on the Exchange. Beginning in PY2023, issuers are required to submit their Formulary Directories in the HIOS SSM (in addition to their Formulary URLs) for all URL IDs; issuers must submit their Formulary Directories by the secondary submission deadline.

CMS reviews formularies to ensure that they contain accurate issuer marketing information for consumers and that there are no inaccuracies when compared to data within an issuer's submitted QHP Application. CMS will perform reviews on the Formulary Directories following the secondary submission deadline, and release review results in the PM Community.

## Certification Notices

As indicated in the final Letter to Issuers, CMS will send Certification Notices to issuers at the conclusion of the QHP Application certification process. These notices prompt issuers to review final lists of certified plans and download CMS-countersigned QHP Agreements from the PM Community. The documents apply to all QHPs, including SADPs, offered by a single issuer at the issuer ID level or designee company. **Receipt of a QHP Certification Agreement with CMS signature and final validated plan list completes the certification process for the upcoming plan year.** Certified off-Exchange SADP issuers will only receive a final validated plan list.

CMS reserves the right to identify and communicate corrections prior to and after certification based on the original QHP Application and any changes made to the application, or if CMS determines that any of the submitted information is inaccurate.



### Download Your Countersigned QHP Agreement and Final List of Certified QHPs

Once CMS sends Certification Notices via email, follow the steps below to download the countersigned agreement and plan list attachments.

- Log into the [PM Community](#) and navigate to the Issuers tab.
- Select the applicable issuer ID/plan year combination and locate the Files section.
- Select and download the CMS-countersigned QHP Agreement (on-Exchange only) and final plan list attachments.



## 7. Appendices

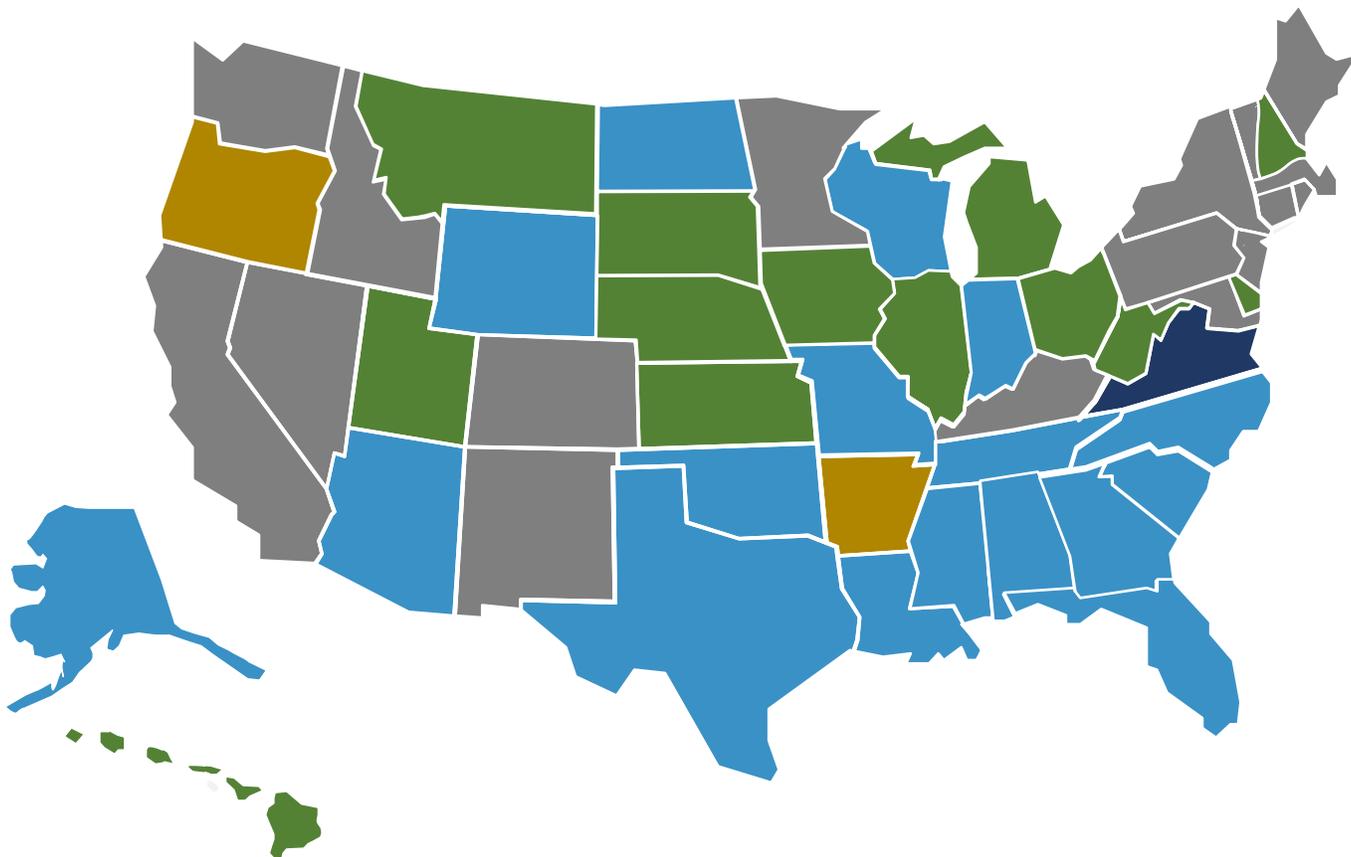
### Appendix A: Acronyms

Below is a list of acronyms used throughout the toolkit and their definitions.

- AV: actuarial value
- AVC: actuarial value calculator
- CCIIO: Center for Consumer Information and Insurance Oversight
- CMS: Centers for Medicare & Medicaid Services
- DCR: data change request
- ECP: essential community provider
- EHB: essential health benefit
- FAQ: frequently asked question
- FFE: Federally-facilitated Exchange
- HEDIS: Healthcare Effectiveness Data and Information Set
- HHS: Department of Health and Human Services
- HIOS: Health Insurance Oversight System
- IDSS: Interactive Data Submission System
- LDCW: Limited Data Correction Window
- MQI: Marketplace Quality Initiatives
- MSD: Marketplace Service Desk
- NAIC: National Association of Insurance Commissioners
- NCQA: National Committee for Quality Assurance
- PM: plan management
- PY: plan year
- QHP: qualified health plan
- QIS Quality Improvement Strategy
- QRS: Quality Rating System
- SADP: stand-alone dental plan
- SBC: Summary of Benefits and Coverage
- SBE: State-based Exchange
- SBE-FP: State-based Exchange on the Federal Platform
- SEP: Special Enrollment Period
- SERFF: System for Electronic Rates & Forms Filing
- SHOP: Small Business Health Options Program
- SSM: Supplemental Submission Module
- URR: Unified Rate Review



## Appendix B: State Exchange Type Map



<sup>4</sup> Texas, Oklahoma, Wyoming, and Missouri do not enforce PPACA market-wide requirements. Additionally, Oklahoma and Wyoming do not have effective rate review programs.

<sup>5</sup> Hawaii 1332 waiver for small group coverage to be available directly from issuers.

## Appendix C: QHP Application Material Submission Systems

Application Material	Issuers in FFEs	Issuers in states performing plan management functions, SBE-FPs
Accreditation Questions	HIOS QHP Issuer Module	N/A
Actuarial Memorandum	SERFF*	SERFF*
Business Rules Template	HIOS QHP Rating Module	SERFF
Compliance Plan and Organizational Chart	HIOS QHP Rating Module	SERFF
Consumer Justification Narrative (if applicable)	SERFF*	SERFF*
Discrimination – Cost Sharing Outlier Supporting Documentation and Justification	HIOS QHP Benefits & Service Area Module	SERFF
Discrimination – Treatment Protocol Supporting Documentation and Justification	HIOS QHP Benefits & Service Area Module	SERFF
ECP Justification – Medical QHPs Applying Under General ECP Standard	PM Community	PM Community
ECP Justification – SADPs Applying Under General ECP Standard	PM Community	PM Community
ECP Justification – Medical QHPs Applying Under Alternate ECP Standard	PM Community	PM Community
ECP Justification – SADPs Applying Under Alternate ECP Standard	PM Community	PM Community
ECP Write-in Worksheet	HIOS QHP Issuer Module	SERFF
ECP/Network Adequacy Attestation	HIOS QHP Issuer Module	SERFF
ECP/Network Adequacy Template	HIOS QHP Issuer Module	SERFF
EHB-Substituted Benefit Supporting Documentation	HIOS QHP Benefits & Service Area Module	SERFF
Formulary Directory	HIOS SSM	HIOS SSM
Formulary Supporting Documentation	HIOS QHP Benefits & Service Area Module	SERFF
Formulary URL	HIOS SSM	HIOS SSM
Interoperability Attestation and Justification Form	HIOS SSM	HIOS SSM
Issuer Marketplace Information Administrative Data	HIOS Plan Finder Module	HIOS Plan Finder Module
Machine-Readable Index URL	HIOS SSM	HIOS SSM
Network Adequacy Justification	PM Community	PM Community
Network ID Template	HIOS QHP Benefits & Service Area Module	SERFF
Network URL	HIOS SSM	HIOS SSM
Payment URL	HIOS SSM	HIOS SSM
Plan Brochure URL	HIOS SSM	HIOS SSM
Plan ID Crosswalk Justification	PM Community	PM Community
Plan ID Crosswalk State Authorization	PM Community	PM Community
Plan ID Crosswalk Template	PM Community	PM Community
Plans & Benefits Template	HIOS QHP Benefits & Service Area Module	SERFF
Prescription Drug Template	HIOS QHP Benefits & Service Area Module	SERFF
Prescription Drug Combined Supporting Document and Justification	HIOS QHP Benefits & Service Area Module	SERFF



Application Material	Issuers in FFEs	Issuers in states performing plan management functions, SBE-FPs
Optional Program Attestation Justification	HIOS QHP Issuer Module	N/A
QIS Form	HIOS QHP Issuer Module	SERFF
Rates Table Template	HIOS QHP Rating Module	SERFF
SADP AV Supporting Documentation	HIOS QHP Benefits & Service Area Module	SERFF
SADP Description of EHB Allocation	HIOS QHP Benefits & Service Area Module	SERFF
SBC URL	HIOS SSM	HIOS SSM
SBC Form	HIOS SSM	HIOS SSM
Service Area Partial County Justification	HIOS QHP Benefits & Service Area Module	SERFF
Service Area Template	HIOS QHP Benefits & Service Area Module	SERFF
Stand-alone AVC screenshot	HIOS QHP Benefits & Service Area Module	SERFF
State Partnership Exchange Issuer Program Attestation Response Form	N/A	SERFF
Transparency in Coverage Template	HIOS QHP Benefits & Service Area Module	SERFF
Transparency in Coverage URL	HIOS SSM	HIOS SSM
Unique Plan Design Supporting Documentation	HIOS QHP Benefits & Service Area Module	SERFF
URR Template	SERFF*	SERFF*

\* Issuers in states that do not have an effective rate review program or SERFF filing access will submit these materials in the HIOS URR Module.

