QHP Certification
Health Insurance Marketplace

Plan Year 2024 QHP Certification Issuer Toolkit

Last Updated: May 1, 2023

Contents

QHP Certification
Health Insurance Marketplace

Section 1: Overview

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Introduction

The PY2024 QHP Certification Issuer Toolkit consolidates important information about the plan year (PY) 2024 QHP Application, and includes lists of tasks for issuers to complete throughout 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.

Change Log

Changes made after initial QHP Certification Issuer Toolkit publishing are listed by section and corresponding publishing date.

Revised Section	Date

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 submission and 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 PREPARATION
Review resources that are available to issuers seeking QHP certification, and prepare to initiate your QHP Application(s) by gaining access to the necessary submission systems depending on your state Exchange type(s).

APPLICATION MATERIAL REQUIREMENTS (BY DEADLINE)
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 INITIATION
Review the required steps for validating your QHP Application data, reviewing the related pre-submission validation results, and cross validating your complete QHP Application prior to submitting it to CMS for review.

APPLICATION SUBMISSION
Before you submit application materials, confirm you have followed all submission steps to submit your application data to CMS and checked your submission status.

DATA CHANGES AND CORRECTIONS
Learn how to access your review results 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.

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

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

Published Resource Available! This icon appears throughout the toolkit when an existing published resource is available for further guidance.

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.

Technical Assistance

CMS has made a variety of technical assistance resources available to issuers seeking QHP certification. To take advantage of these resources, take the below steps prior to initiating your QHP Application(s):

- ☐ 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.

PY2024 QHP Data Submission and Certification Timeline

Below is the PY2024 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.

Activity	Dates
QHP Application submission and data validation window opens[1]	4/19/23
Early Bird Application Deadline: Optional Early Bird deadline for issuers to submit QHP Applications to CMS	5/17/23
CMS reviews Early Bird QHP Application data and releases results for issuers and states to review	5/18/23 – 6/9/23
HHS-approved QHP Enrollee Survey vendor securely submits the QHP Enrollee Survey response data to CMS on behalf of the QHP issuer[2]	5/19/23
Initial Application Deadline: Initial deadline for issuers to submit QHP Applications to CMS, including Plan ID Crosswalk data	6/14/23
QHP issuer submits the validated QRS clinical measure data, with attestation, to CMS via NCQA's IDSS[3]	6/15/23
CMS reviews initial QHP Applications and releases results for issuers and states to review	6/15/23 – 7/14/23
Secondary Application Deadline: 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	7/19/23
CMS reviews Rates Table Template data and resubmitted QHP Application data, and releases results for issuers and states to review	7/20/23 – 8/11/23
QHP issuers, Exchange administrators, and CMS preview the 2023 QHP quality rating information	Aug./Sep. 2023
Issuer Plan Confirmation/Crosswalk Deadline: Issuers complete final plan confirmation and submit final Plan ID Crosswalk Templates	8/9/23 – 8/23/23
Final Application Deadline: Deadline for issuers to submit changes to their QHP Applications	8/16/23
CMS reviews QHP Applications and releases results for issuers and states to review	8/17/23 – 9/11/23
CMS sends QHP Certification Agreements to issuers	9/12/23
QHP Agreement Signing Deadline: Issuers return signed QHP Certification Agreements to CMS	9/12/23 – 9/20/23
State Plan Confirmation Deadline: States complete final plan confirmation	9/12/23 – 9/20/23
Limited data correction window	9/14/23 – 9/15/23
Machine-Readable/URL Deadline: Deadline for issuers' URL data, including Machine-Readable and marketing URLs, to be posted, live and active.	9/20/23
CMS releases certification notices to issuers and states	10/3/23 –10/4/23
Anticipated public display of QHP quality rating information	11/1/23
Open Enrollment begins	11/1/23

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[1] QHP Application submission is tentatively scheduled to begin on April 19, 2023 pending release of the final HHS Notice of Benefit and Payment Parameters for 2024. The QHP Application submission window will open and QHP Application materials, including templates and instructions, will be made available shortly after the release of the Payment Notice.

[2] QRS and QHP Enrollee Survey Technical Guidance for 2023, available at https://www.cms.gov/files/document/2023-qrs-qhp-enrollee-survey-technical-guidance.pdf.

[3] 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 IDS.

HIOS Marketplace Plan Management System (MPMS) Module

New for PY2024, issuers that previously submitted QHP Application data in the Issuer, Benefits & Service Area, Rating, and Supplemental Submission Modules within HIOS will instead submit this data in the new HIOS MPMS Module. Issuers in states without an effective rate review program and issuers that do not have access to SERFF will continue to utilize the HIOS URR Module as well.

The MPMS Module is a web application where issuers can validate plan data prior to submission, as well as submit QHPs and SADPs to CMS for review and certification. All issuers, regardless of state Exchange model, will need to gain access to the MPMS Module, although issuers in states performing plan management functions and SBE-FPs will continue to submit the majority of their QHP Application data through SERFF.

The MPMS Module is divided into three primary sections:

1. **Home Page**: The Home page is the first screen issuers see when navigating to the system. It provides issuers with the ability to view announcements pertaining to their applications, metrics about any applications they may have started for the current plan year, and easy navigation to other areas of the system.

2. **Plan Validation Workspace:** The Plan Validation Workspace is used to upload and validate QHP Application templates. Issuers may upload one or more templates at a time for validation, and cross validate the current templates uploaded in the system to be associated to a QHP Application for a given issuer ID within their parent organization. **All QHP applicants, including issuers in states performing plan management functions and SBE-FP states, will need to use the Plan Validation Workspace.**

3. **QHP Applications:** The QHP Application screens are used to create or edit existing applications. Issuers may link valid QHP Application templates previously uploaded in the Plan Validation Workspace to QHP Applications, complete attestations, and provide supplemental application documentation. Issuers may also view review results provided by CMS based on their submitted QHP Application data.

CMS will make additional guidance on navigating the MPMS Module available to issuers on the Submission Systems webpage of the QHP certification website.

> **SERFF Tips...** Issuers in states performing plan management functions and SBE-FPs will continue to submit the bulk of their QHP Application data through SERFF, but will not be able to submit data in SERFF until their plan data passes all validations through SERFF Validate & Transform. To avoid submission delays that could cause them to miss CMS or state submission deadlines, issuers are required to validate their QHP Application data in the Plan Validation Workspace and remediate all identified validation errors prior to submitting their application. Issuers will not be able to submit their applications to their state via SERFF until all validation errors are resolved.

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Section 2: Application Preparation

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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; **users are required to have a PM Issuer Submitter role**.
  - ☐ Obtain access to the required MPMS, Plan Finder, and URR modules, as needed.
    - ▪ **Both new and existing HIOS users must request access to the MPMS Module for PY2024**.

☐ **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 URRT Tab of SERFF. This does not apply to issuers in Oklahoma, Wyoming, and Florida, and is not required for SADP issuers.
  - ▪ Issuers in Texas, Wyoming, Oklahoma, and Missouri must submit form filings in SERFF for CMS's ACA review. Issuers in American Samoa, Arizona, Arkansas, Connecticut, Delaware, Florida, Guam, Hawaii, Illinois, Indiana, Louisiana, Massachusetts, Missouri, Nevada, New Hampshire, Northern Mariana Islands, Oklahoma, Rhode Island, Texas, Virginia, and Wyoming must submit form filings in SERFF for CMS's CAA review. This is not required for SADP issuers. Contact NAIC or the SERFF Plan Management Help Desk for support.

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.

CMS Recommends… Setting periodic reminders to regularly check your parent organization's PM Community contact list for needed updates.

> ▷ **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.

Section 3: Application Material Requirements (By Deadline)

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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. A full list of review areas and where the associated review results will be made available to issuers can be found in Appendix D.

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

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

Early Bird Deadline
5/17/2023

Initial Deadline
6/14/2023

Secondary Deadline
7/19/2023

Final Deadline
8/16/2023

Once you are ready to submit your application, refer to the *Application Submission checklist* of this toolkit.

> **A security update affecting Excel-based QHP Application materials** was implemented by Microsoft in June 2022; this update blocks the enabling of macros in Excel files unless the macros are trusted. To address this issue, you need to create a trusted location on your local computer; this trusted location allows the macros in all affected files to function as intended, so you can leverage full functionality of the QHP Application templates and accompanying tools. Note that each individual engaging with one or more of these materials will need to follow these steps on their own local devices. For more information, including further step-by-step guidance, reference the QHP Application Instructions webpage of the QHP certification website.

Early Bird Deadline Application Material Checklist (Optional)

The Early Bird submission deadline is optional but encouraged for issuers seeking QHP certification. Issuers that choose to participate must validate their application(s) and 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 by the Early Bird deadline and release review results to issuers and states at least once prior to the required initial application submission deadline, offering issuers an additional opportunity to review and make corrections.

☐ Use the table below, the Application Initiation Checklist, and the Application Submission Checklist to submit QHP Application data for the Early Bird deadline of 5/17/23.

Materials: Reference Appendix C 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 Authorization	✓	N/A	N/A	N/A	N/A	N/A
Business Rules Template	✓	✓	✓	✓	✓	✓
ECP/NA 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
Service Area Template	✓	✓	✓	✓	✓	✓
Transparency in Coverage Template & URL	✓	✓	✓	✓	✓	✓
Plan ID Crosswalk Template and State Authorization *(PY2023-certified issuers only)*	*Optional*					
Rates Table Template	*Optional;* **CMS will no longer accept "dummy rates," which will be flagged as validation errors**					

Initial Deadline Application Material Checklist

Issuers seeking QHP certification must validate and 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 based on data submitted by the Early Bird deadline (if applicable).

☐ Use the table below, the Application Initiation Checklist, and the Application Submission Checklist to validate and submit QHP Application data for the initial deadline of 6/14/23.

Materials: Reference Appendix C 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 Authorization	✓	N/A	N/A	N/A	N/A	N/A
Business Rules Template	✓	✓	✓	✓	✓	✓
ECP/NA 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	✓	✓	✓	✓	✓	✓
Plan ID Crosswalk Template and State Authorization *(PY2023-certified issuers only)*	✓	✓	✓	✓	✓	✓
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
Service Area Template	✓	✓	✓	✓	✓	✓
Transparency in Coverage Template & URL	✓	✓	✓	✓	✓	✓
Rates Table Template	*Optional;* **CMS will no longer accept "dummy rates," which will be flagged as validation errors**					

Secondary Deadline Application Material Checklist

Issuers seeking QHP certification must validate and 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 validate and submit the Rates Table Template and URR data, if applicable, to CMS by the secondary deadline, CMS also encourages issuers to review the required corrections released in the MPMS Module and the PM Community thus far and resubmit corrected application data by the secondary deadline. CMS will conduct additional QHP certification reviews on revised QHP Applications that are submitted by the secondary deadline, and will release additional required corrections in the MPMS Module and the PM Community at least once prior to the next submission deadline, providing issuers with an additional opportunity to review and make corrections before the final submission deadline.

☐ Use the Data Changes and Corrections Checklist to make required corrections based on data submitted by the initial deadline.

☐ Use the table below, the Application Initiation Checklist, and the Application Submission Checklist to validate and submit required materials and corrected QHP Application data for the secondary deadline of 7/19/23.

Materials: Reference Appendix C 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
URR Template	✓	N/A	✓	N/A	✓	N/A
Rates Table Template	✓	✓	✓	✓	✓	✓
All Other Application Materials	*Optional*					

Final Deadline Application Material Checklist

Issuers are required to finalize all application data by the final submission deadline ("final deadline"). Issuers are only required to re-validate and resubmit 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 based on data submitted by the secondary deadline.

☐ Use the table below, the Application Initiation Checklist, and the Application Submission Checklist to submit required materials and corrected QHP Application data for the final deadline of 8/16/23.

Materials: Reference Appendix C 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
All application materials, with the exception of Marketing URLs and Machine-Readable Index URLs	*Required if corrections were identified by CMS or your state*					

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Section 4: Application Initiation and Validation

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Plan Validation Workspace

Beginning in PY2024, issuers in all states are required to validate their QHP Application data for compliance with a number of federal standards—including data integrity—prior to submitting these data either to CMS (via the HIOS MPMS Module) or to their state (via SERFF).

All issuers are <u>required</u> to validate their QHP Application data in the Plan Validation Workspace and remediate all identified validation errors prior to submitting their applications to CMS. **Issuers will not be able to submit their applications to CMS via the HIOS MPMS Module or to their state via SERFF until all validation errors are resolved**.

As in prior years, issuers in states performing plan management functions and SBE-FP issuers must pass validations within SERFF Validate & Transform in order to submit their QHP Applications to their states. SERFF Validate & Transform has been enhanced to include several new validations, including those related to data integrity and standardized plan options.

> Reference the MPMS Module User Guide and the Data Validation webpage of the QHP certification website for additional instructions on navigating the MPMS Module and Plan Validation Workspace.

Pre-Submission Review Results

Validating application data or cross validating an application within the Plan Validation Workspace allows issuers to access their pre-submission review results. Pre-submission review results ("validation results") display as **validation errors** (which issuers are required to correct prior to submitting an application) and **validation warnings** (which issuers should review to determine whether a correction needs to be made to an application prior to submitting). **Issuers will not be able to submit their applications to CMS via the HIOS MPMS Module or to their state via SERFF until all validation errors are resolved.**

> **SERFF Tips…** Issuers in states performing plan management functions and SBE-FPs must use the Plan Validation Workspace prior to SERFF Validate & Transform.
>
> - Validate & Transform will identify the same **validation errors** as the MPMS Module. Issuers must correct these errors before submitting their QHP data.
> - Validate & Transform will <u>**not**</u> identify **validation warnings**, which are unexpected conditions in issuers' data.
> - Issuers can only check QHP data for validation warnings by using the Plan Validation Workspace.

CMS will continue to release post-submission review results ("required corrections") for **all issuers** based on data submitted by the prior submission deadline at least once before the next submission deadline. For additional information on both pre- and post-submission review results, please access the QHP Application Review Results webpage of the QHP certification website.

Validate Your Application Data

Once issuers have logged into the HIOS MPMS Module, they can take the following steps to validate their QHP Application templates:

- ☐ **Select the plan year and issuer ID** for validation.
- ☐ **Select "Show Workspace"** to begin uploading files for validation.
- ☐ **Upload files for validation** in the "Upload Files" section.
  - o The system will automatically identify the type of template uploaded, regardless of naming convention. You may remove a file by selecting the trash can icon listed next to the template.
- ☐ **Select "Validate"** to submit the files for validation.

Review Your Validation Results

Issuers should review each validation result listed in the Validation Results section. For any identified errors and warnings, issuers should review the detailed validation messages and then make any needed corrections, including uploading required justifications or supporting documents.

- ☐ **Click "View Results" to review each uploaded template's validation results** listed in the Validation Results section.
  - o Issuers are able to filter their view by product and market coverage types.
- ☐ **Make required corrections** as needed, including preparing required justifications or supporting documents.
  - o If errors or warnings are identified, click the included hyperlink to access detailed validation messages. Issuers can download these validation messages by selecting Download (CSV).

Validation Result	Description
No Errors Found	The template passed all validations.
Warnings Found	The template is acceptable, but the user may need to provide a justification if the template is linked to a QHP Application, or there is an unexpected data condition CMS would like to flag to the user.
Errors Found	Errors are present within the template that require correction before the template can be linked to the QHP Application. This status will also display if there are errors and warnings present in the template.
Processing Error	A processing error was encountered with the file. Try generating a new XML file using the "Finalize" button in the template and re-uploading. If the issue continues, contact the MSD.

Create a New QHP Application

After navigating to the QHP Applications section of the module, you may select the plan year, issuer, product offering, and market coverage type for the new QHP Application you would like to create. CMS recommends FFE issuers create new QHP Applications in the MPMS Module after they have validated their application data and resolved all validation errors.

SERFF-submitting issuers are strongly encouraged to create a new QHP Application in the MPMS Module before their state transfers their QHP Application data from SERFF to HIOS so that they can begin submitting URL data and reviewing required corrections on administrative data, rather than waiting to complete these steps until after its remaining application materials have been transferred. Any application data that is subsequently transferred from SERFF to HIOS will be associated with this newly created application. If SERFF-submitting issuers do not create a new QHP Application prior to their state transferring their application data, the SERFF transfer will trigger the creation of a new application.

Link Templates to a QHP Application

After selecting the Create Application button, FFE issuers are able to select any valid templates available in the Plan Validation Workspace to link them to the newly created application. Only templates with a status of "No Errors Found" or "Warnings Found" can be linked to an application. **FFE issuers may choose to link templates in two ways:**

☐ **Link files on the Application Overview page** by clicking "Link Files" at the top of the Application Overview page and selecting the desired files (issuers also have the option to immediately link uploaded files within a pop-up window that is generated after a new application is created); or

☐ **Link files on a specific application section page** by selecting the desired application section from the Application Overview page, clicking "Open Workspace", uploading a template, and clicking "Link to Application". This option is primarily recommended if a new template needs to be uploaded.

Section 5: Application Submission

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Application Sections and Groupings

The QHP Application is divided into individual sections and groupings within the MPMS Module. Application sections will display one of two statuses: **In Progress** or **Ready to Submit**. Each application grouping will display a status of **Not Started**, **In Progress**, **Submitted – Under Review**, **Corrections Required**, or **No Action Required**.

Once FFE issuers have created an application, they can begin editing each of the application sections. For sections that require the submission of one or more QHP Application templates, issuers will first need to upload the required templates to the Plan Validation Workspace and resolve identified errors before these templates can be linked to the corresponding section of the application. Once all sections in a group are in a **Ready to Submit** status, issuers can click a button to submit that group to CMS for review.

Application Grouping	Application Section
Issuer Attestations and Administrative Information	Administrative
	Interoperability
	Program Attestations
Plan Business Rules	Business Rules
Plan Attributes	ECP/NA & Network ID
	Plans & Benefits
	Prescription Drugs
	Service Area
Issuer Accreditation	Accreditation
Transparency Data	Transparency in Coverage
Plan Rates	Rates Table
	URR[4]
Issuer URLs	URL

Individual application groupings will be locked (i.e., not able to be edited) while CMS conducts reviews on the submitted data. After CMS's review of *all* sections within a given group is complete, the application grouping will display a status of **Corrections Required** or **No Action Required**, depending on whether required corrections were identified as part of CMS's reviews. Issuers will receive review results as CMS completes reviews for each application section, but issuers will not be able to make edits to any sections within a group until CMS completes reviews for *all* sections within that group.

Cross Validate Your Application

After reviewing and correcting validation errors and validation warnings (if applicable), issuers are able to proceed with cross validating their QHP Application templates. While issuers are able to cross validate within the Application Overview page, **CMS encourages issuers to cross validate within the Plan Validation Workspace**. Only templates in a validation status of **No Errors Found** or **Warnings Found** can be cross validated.

Issuers are required to cross validate their applications and remediate any identified errors prior to submission to CMS.

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[4] Issuers do not submit the URR Template within the MPMS Module; this application section acknowledges submission of the URR Template through either SERFF or the URR Module within HIOS, depending on the issuer.

☐ **Select "Cross Validate"** at the bottom of the Plan Validation Workspace.

☐ **Review each cross validation result** in the Cross Validation Checks section, which displays the types of cross validation checks that were performed, based on the templates uploaded in the Plan Validation Workspace.

☐ **Make required corrections** as needed, including preparing required justifications or supporting documents.

    o   If errors or warnings are identified, click the included hyperlink to access detailed validation messages. Issuers can download these results by selecting Download All Results (CSV).

Submit Your Application

Once you have completed all necessary application materials, resolved all required validation errors and any optional validation warnings, and created and cross validated your application (if applicable), 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

☐ **Upload** application materials to the module.

☐ **Validate** application templates in the Plan Validation Workspace.

☐ **Create a new application** and link templates to the application.

☐ **Cross validate** your application in the Plan Validation Workspace.
    Cross validation is a required step for submitting an application, regardless of the applicable submission deadline.

☐ **Submit all required application groupings** by the relevant submission deadline.

> Reference the submission system user guides posted on the QHP certification website for further information on navigating HIOS.

Issuers in States Performing Plan Management Functions & SBE-FPs

☐ **Validate** application templates in the Plan Validation Workspace of the MPMS Module.

☐ **Create a new application in MPMS.**

☐ **Upload** the necessary validated materials to the applicable SERFF binders.

☐ **Upload** the necessary materials to the MPMS Module after your state has transferred SERFF binders.

☐ **Confirm** in SERFF that your state has transferred the most recent data for all plans to CMS.

☐ **Resubmit groups as needed**, if you submitted data within the MPMS Module for a grouping that your state had already transferred data for.

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.

Reference the SERFF website for further information on navigating and submitting in SERFF.

SERFF Tips… Upload only one version of the Business Rules, Network ID, Service Area, and Transparency in Coverage Templates to all SERFF binders associated with a given issuer to avoid template overwrite issues.

PY2023-Certified On-Exchange Issuers

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

Reference the Plan ID Crosswalk Instructions for further information on Plan ID Crosswalk submission requirements.

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

Check Your Submission Status

Follow the steps below to check your application submission status in the MPMS Module after submitting application groupings, and for each deadline.

All Issuers

☐ Log into the MPMS Module and confirm each application grouping that is required for the relevant submission deadline has a status of **Submitted – Under Review**, **Corrections Required**, or **No Action Required.**
☐ Log into the MPMS Module and confirm your overall application has a status of **Submitted** or **Corrections Required.**
☐ 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.
   o **Off-Exchange SADP** and **All New PY2024 Issuers:** If you are not able to locate the issuer ID for the current plan year, CMS has not received your QHP Application.
   o **PY2023-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.
   o **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.
   o **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.

> Reference the PM Community User Guides for further information on navigating the PM Community.

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

PY2023-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.

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Section 6: Data Changes and Corrections

Last Updated: May 1, 2023

QHP Application data must be validated and submitted to CMS by the initial application deadline. CMS will then conduct reviews and release required corrections in the QHP Applications page of the HIOS MPMS Module. Issuers are expected to make corrections, re-validate updated data, and re-submit their applications to CMS or their state as soon as possible, but by no later than the deadlines specified in the timeline. For some review areas, CMS will re-review newly submitted data and release additional review results prior to the secondary or final deadline.

> Reference the Data Change Windows webpage of the QHP certification website for further information on QHP Application data changes.

	Permitted with No State or CMS Authorization Required	Permitted with Authorization[5]	Not Permitted
Before the Initial Deadline	All data changes permitted.	N/A	N/A
Between the Initial and Final Deadlines	All changes are permitted, including changes in response to CMS-identified corrections, except where noted.	N/A	Issuers may not: • Add new plans; • Change an off-Exchange plan to be both on- and off-Exchange; • Change plan type(s) or market type(s); or • Change QHPs, excluding SADPs, from a child-only plan to a non-child-only plan.
After the Final Deadline	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.

Pre- and Post-Submission Review Results

Throughout the QHP Application validation and submission process, CMS releases review results to issuers to communicate validation errors and warnings as well as required corrections that issuers need to make to their applications. CMS's review results are categorized as **pre-submission review results**, or validation results, and **post-submission review results**, or required corrections.

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[5] Required authorization to change QHP data, and the process for requesting authorization, differs by state Exchange type.

Pre-Submission Review Results

Issuers receive pre-submission review results by validating application data in the Plan Validation Workspace, interacting with SERFF Validate & Transform, or by cross validating application data in either the Plan Validation Workspace or the MPMS Module. There are two types of pre-submission review results:

Validation Errors	Validation Warnings
These identify data integrity and other data errors present in issuers' applications. Issuers are required to correct all validation errors prior to submitting an application.	These identify potential issues present in issuers' applications, including those related to data integrity or the submission of supporting documents and justifications.

Post-Submission Review Results

Issuers receive post-submission review results after CMS receives one or more components of an issuer's QHP Application and reviews that data for compliance with one or more federal standards. Once CMS completes these reviews, results are shared in either the MPMS Module or the PM Community; these review results reflect required corrections to issuers' applications.

Required Corrections Released Before the Final QHP Application Submission Deadline	Required Corrections Released After the Final QHP Application Submission Deadline
Issuers should make needed corrections to their applications and submit their updated data to CMS as soon as possible, but by no later than the deadlines specified in the timeline. For some review areas, CMS will re-review data resubmitted and release additional review results prior to the final deadline.	Issuers should review the corrections and follow instructions from CMS to make corrections and submit updated data, if needed.

The QHP Application Review Results webpage of the QHP certification website includes additional information about pre- and post-submission review results, including a description of each review area for which an issuer can anticipate receiving review results.

Access Your Review Results and Make Required Corrections

☐ **Review the** QHP Application Review Results webpage of the QHP certification website to determine which reviews are conducted for each Exchange type, and following each submission deadline.

Reference the Common Review Results Guidance for guidance on resolving some of the most common validation errors and warnings, and required corrections.

Reference the Data Validation webpage of the QHP certification website for additional instructions on navigating the MPMS Module and Plan Validation Workspace.

☐ **Log into the applicable systems to access required corrections.** Issuers will be notified when new review results are available for them to review. A full list of review areas and where the associated review results will be made available to issuers can be found in Appendix D.

> ### HIOS MPMS Module
> ☐ Access the relevant review results by clicking the correction banner at the top of each application section on the Application Overview page.
>
> ### PM Community
> ☐ Access the relevant review results in either the Corrections tab or Issuers tab.

☐ **Make the required corrections** to your QHP Application.

> ### Corrections Prior to the Final Submission Deadline
> ☐ Update the relevant application materials and resubmit them to CMS as soon as possible, but by no later than the next deadline.
>
> ### Corrections Following the Final Submission Deadline
> ☐ 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.

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Section 7: Certification Preparedness

Last Updated: May 1, 2023

Quality Data

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.

Reference the MQI website for additional guidance and resources on quality rating information.

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.	September 30, 2022
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 27, 2023
QHP issuer and HEDIS Compliance Auditor (employee of or contracted by the HEDIS Compliance Organization) complete validation of QHP Enrollee Survey sample frame.	January 31, 2023
HHS-approved QHP Enrollee Survey vendor securely submits the QHP Enrollee Survey response data to CMS (on behalf of the QHP issuer).	May 19, 2023
QHP issuer submits the validated QRS clinical measure data, with attestation, to CMS via NCQA's IDSS.	June 15, 2023
QHP issuers preview the 2022 QHP quality rating information.	August/September 2023

Rate Review Requirements (by Deadline)

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 SERFF or the URR Module of HIOS (for states without an effective rate review program or states that do not perform rate review in SERFF);
- The most recent version of the URR Template; and
- The most recent version of the URR Template Instructions.

Reference the URR Instructions on the Unified Rate Review webpage of the QHP certification website.

Activity	Dates
Submission deadline for issuers in OK and WY to submit proposed rate filing justifications to CMS.	June 1, 2023
Submission deadline for issuers in all other states and the District of Columbia to submit proposed rate filing justifications to CMS.	July 19, 2023
Deadline for QHP issuers in states with an Exchange served by the HealthCare.gov platform to submit final rate filing justifications to CMS.	August 16, 2023
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 16, 2023

States that can access SERFF, and states with an effective rate review program, are required to file the PY2024 URRT in SERFF; this includes issuers in states that do not perform plan management functions and otherwise submit QHP application data in HIOS. A rate filing that is filed through SERFF and automatically uploaded to the URR Module of HIOS will be considered filed with CMS. This transfer method does not apply to states that do not have an effective rate review program and states that do not use SERFF for rate review purposes; issuers in those states will submit rate filings directly into the URR Module of HIOS.

Final Issuer Plan Confirmation

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.

> **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.

> PM Community User Guides are available on the Resources and Training tab of the PM Community.

> **The 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 PY2024 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:
- 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.

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.

> Reference the QHP URL Reviews Checklist on the URLs webpage of the QHP certification website for further guidance on submitting URL data.

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 2024 plan year.

URL Type	Submission Location	Submission Deadline	Live and Active Deadline
Transparency in Coverage	Transparency in Coverage section of the MPMS Module	June 14, 2023*	Upon URL Submission
Marketing (SBC, Plan Brochure, Payment, Formulary, Network)	URLs section of the MPMS Module	September 20, 2023	September 20, 2023
Machine-Readable Index.JSON	Issuer Details tab of the MPMS Module	September 20, 2023	September 20, 2023

*If you choose to submit a QHP Application by the Early Bird submission deadline, Transparency in Coverage URLs are required by 5/17/23.

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Section 8: Appendices

Last Updated: May 1, 2023

Appendix A: Acronyms

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

- AV: actuarial value
- AVC: actuarial value calculator
- CAA: Consolidated Appropriations Act
- CCIIO: Center for Consumer Information and Insurance Oversight
- CMS: Centers for Medicare & Medicaid Services
- DCR: data change request
- ECP: essential community providers
- 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
- MPMS: Marketplace Plan Management System
- NA: Network Adequacy
- 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
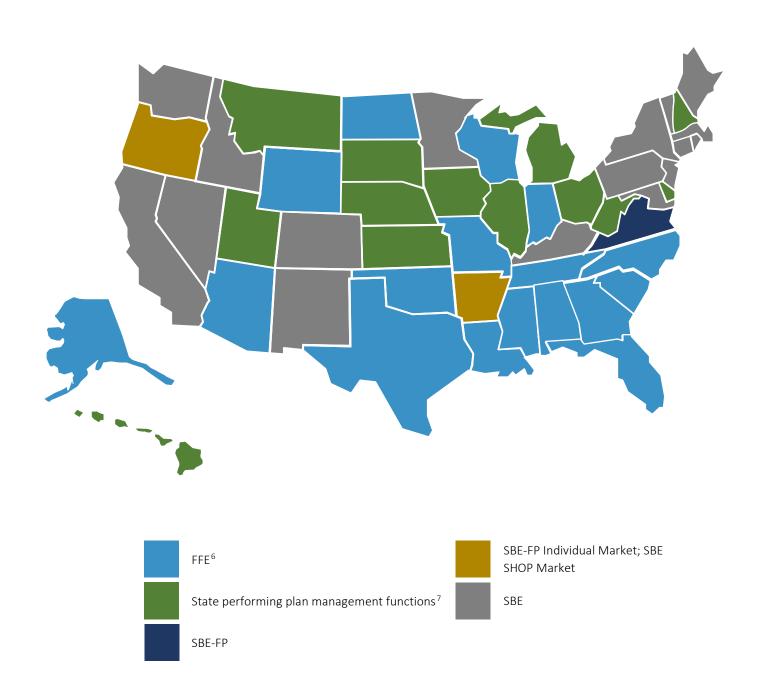- URR: Unified Rate Review

Legend:

- FFE[6]
- State performing plan management functions[7]
- SBE-FP
- SBE-FP Individual Market; SBE SHOP Market
- SBE

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[6] Missouri, Oklahoma, Texas, and Wyoming do not enforce PPACA market-wide requirements. Additionally, Oklahoma and Wyoming do not have effective rate review programs.

[7] Hawaii 1332 waiver for small group coverage to be available directly from issuers.

Application Material	Issuers in FFEs	Issuers in states performing plan management functions, SBE-FPs
Accreditation Authorization	HIOS MPMS Module	N/A
Actuarial Memorandum	SERFF*	SERFF*
Adverse Tiering Justification	HIOS MPMS Module	SERFF
Business Rules Template	HIOS MPMS Module	SERFF
Consumer Justification Narrative (if applicable)	SERFF*	SERFF*
Discrimination – Cost Sharing Outlier Supporting Documentation and Justification	HIOS MPMS Module	SERFF
Discrimination – Treatment Protocol Supporting Documentation and Justification	HIOS MPMS Module	SERFF
ECP Justification	PM Community	PM Community
ECP Write-in Worksheet	HIOS MPMS Module	SERFF
ECP/NA Attestation	HIOS MPMS Module	SERFF
ECP/NA Template	HIOS MPMS Module	SERFF
EHB-Substituted Benefit Supporting Documentation	HIOS MPMS Module	SERFF
Formulary Supporting Documentation	HIOS MPMS Module	SERFF
Formulary URL	HIOS MPMS Module	HIOS MPMS Module
Interoperability Attestation and Justification Form	HIOS MPMS Module	HIOS MPMS Module
Issuer Marketplace Information Administrative Data	HIOS Plan Finder Module	HIOS Plan Finder Module
Machine-Readable Index URL	HIOS MPMS Module	HIOS MPMS Module
Network Adequacy Justification	PM Community	PM Community
Network ID Template	HIOS MPMS Module	SERFF
Network URL	HIOS MPMS Module	HIOS MPMS Module
Payment URL	HIOS MPMS Module	HIOS MPMS Module
Plan Brochure URL	HIOS MPMS Module	HIOS MPMS Module
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 MPMS Module	SERFF
Prescription Drug Template	HIOS MPMS Module	SERFF
Prescription Drug Combined Supporting Document and Justification	HIOS MPMS Module	SERFF
Program Attestation	HIOS MPMS Module	N/A
QIS Form	HIOS MPMS Module	SERFF
Rates Table Template	HIOS MPMS Module	SERFF
SBC URL	HIOS MPMS Module	HIOS MPMS Module
Service Area Partial County Justification	HIOS MPMS Module	SERFF
Service Area Template	HIOS MPMS Module	SERFF
Stand-alone AVC Screenshot	HIOS MPMS Module	SERFF
State Partnership Exchange Issuer Program	N/A	SERFF

Application Material	Issuers in FFEs	Issuers in states performing plan management functions, SBE-FPs
Attestation Response Form		
Transparency in Coverage Template	HIOS MPMS Module	SERFF
Transparency in Coverage URL	HIOS MPMS Module	HIOS MPMS Module
Unique Plan Design Supporting Documentation	HIOS MPMS 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.

Appendix D: Review Results Display System by Review Area

This table outlines which systems issuers will use to access their review results (i.e., validation results and required corrections). Refer to the QHP Application Review Results webpage of the QHP certification website for additional information on the different review results that issuers can expect to receive throughout the QHP certification process.

Review Area	Validation Results in MPMS Module	Required Corrections in MPMS Module	Required Corrections in PM Community
Accreditation	✓	✓	
Administrative	✓		
Adverse Tiering			✓
Cost Sharing	✓		
Data Integrity	✓		
Dental MOOP	✓		
ECP			✓
Interoperability	✓	✓	
Machine-Readable	✓	✓	
Network Adequacy	✓		✓
Network Breadth			✓
Non-Discrimination (Clinical Appropriateness)	✓	✓	
Non-Discrimination (Cost Sharing)			✓
Non-Discrimination (Formulary Outlier)			✓
Non-Discrimination (Treatment Protocol)			✓
Plan ID Crosswalk			✓
Plan Marketing Name			✓
Program Attestations	✓		
QIS			✓
QRS			✓
SADP EHB Benchmark	✓	✓	
Service Area	✓	✓	
Silver/Gold	✓		
Standardized Plan Options	✓		
Transparency in Coverage	✓	✓	
URL	✓	✓	