

# TOOLKIT

# **QHP Certification**

## Health Insurance Marketplace

## Plan Year 2025 QHP Certification Issuer Toolkit

Last Updated: May 3, 2024

Qualified Health Plan



Health Insurance Marketplace

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# TOOLKIT

## **QHP Certification** Health Insurance Marketplace



### Section 1: Overview

Last Updated: May 3, 2024



## Introduction

The PY2025 QHP Certification Issuer Toolkit consolidates important information about the plan year (PY) 2025 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](mailto: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               |
|--|--------------------|
| <ul style="list-style-type: none"> <li>Application Preparation section updated to include Tennessee in the list of states for which CMS reviews form filings for compliance with applicable ACA and CAA requirements, and to denote that Tennessee does not have an Effective Rate Review Program.</li> <li>Certification Preparedness section updated to denote that Tennessee does not have an Effective Rate Review Program.</li> </ul> | <p>May 3, 2024</p> |



## 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 AND VALIDATION

Review the required steps for validating your QHP Application data, reviewing 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.



## PY2025 QHP Data Submission and Certification Timeline

Below is the PY2025 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   | 4/17/24           |
| <b>Early Bird Application Deadline:</b> Optional Early Bird deadline for issuers to submit QHP Applications to CMS  | 5/15/24           |
| CMS reviews Early Bird QHP Application data and releases results for issuers and states to review   | 4/18/24 – 6/7/24  |
| 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>  | 5/17/24           |
| <b>Initial Application Deadline:</b> Initial deadline for issuers to submit QHP Applications to CMS, including Plan ID Crosswalk data   | 6/12/24           |
| QHP issuer submits the validated QRS clinical measure data, with attestation, to CMS via NCQA’s IDSS <sup>2</sup>   | 6/14/24           |
| CMS reviews initial QHP Applications and releases results for issuers and states to review  | 6/13/24 – 7/12/24 |
| <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 | 7/17/24           |
| CMS reviews Rates Table Template data and resubmitted QHP Application data, and releases results for issuers and states to review   | 7/18/24 – 8/9/24  |
| Issuers, Exchange administrators, and CMS preview the 2024 QHP quality rating information   | Aug./Sep. 2024    |
| <b>Issuer Plan Confirmation/Crosswalk Deadline:</b> Issuers complete final plan confirmation and submit final Plan ID Crosswalk Templates   | 8/7/24 – 8/21/24  |
| <b>Final Application Deadline:</b> Deadline for issuers to submit changes to their QHP Applications   | 8/14/24           |
| CMS reviews QHP Applications and releases results for issuers and states to review  | 8/15/24 – 9/9/24  |
| CMS sends QHP Certification Agreements to issuers   | 9/10/24           |
| <b>QHP Agreement Signing Deadline:</b> Issuers return signed QHP Certification Agreements to CMS  | 9/10/24 – 9/18/24 |
| <b>State Plan Confirmation Deadline:</b> States complete final plan confirmation  | 9/10/24 – 9/18/24 |
| Limited data correction window  | 9/12/24 – 9/13/24 |
| <b>Machine-Readable/URL Deadline:</b> Deadline for issuers’ machine-readable data to be posted and marketing URLs to be live and active.  | 9/18/24           |
| CMS releases certification notices to issuers and states  | 10/1/24 – 10/2/24 |
| Anticipated public display of QHP quality rating information  | 11/1/24           |
| Open Enrollment begins  | 11/1/24           |

<sup>1</sup> QRS and QHP Enrollee Survey Technical Guidance for 2024, available at <https://www.cms.gov/files/document/qrs-and-qhp-enrollee-survey-technical-guidance-2024.pdf>.

<sup>2</sup> Each QHP issuer must submit and plan-lock its QRS clinical measure data by May 31 to allow the HEDIS® Compliance Auditor sufficient time to review, approve, and audit-lock all submissions by the June 14 deadline. There are no fees for QHP issuers associated with accessing and using the IDS.



## QHP Application Roadmap

(Issuers in FFE States)

This roadmap serves as a guide for the steps required to complete your QHP Application. Please note, issuers may have to return to earlier steps if errors are encountered or corrections are required.

### Application Preparation

1

#### Prepare application materials:

- Templates
- Justifications
- Supporting Documents

Consult the QHP Certification Issuer Toolkit for:

- A list of other preparation steps, such as confirming submission system access and Exchange requirements
- A comprehensive checklist of materials required for each deadline

### Application Initiation and Validation

2

Create a new QHP Application in the MPMS Module

Only occurs once, ahead of the initial submission deadline

3

#### Upload, validate, and cross validate templates in the Plan Validation Workspace:

3a. Upload templates

3b. Validate templates

3c. Cross validate

Make corrections

Review validation results

Make corrections

Review cross validation results

4

#### Complete required application sections and groups:

4a. Link templates to application

4b. Edit application sections in the HIOS MPMS Module to enter required data, such as interoperability data

4c. Upload any additional materials (e.g., justification forms)

The QHP Application is divided into groups, which are further divided into sections. See Section 5 of the QHP Certification Issuer Toolkit for further details.



## Application Submission

5

Submit application to CMS in the MPMS Module:

5a. Submit all required application groups by clicking "Submit Group"

5b. If applicable, address cross validation results

5c. Confirm application submission status

Required application groups should be in a status of "Submitted - Under Review," "Corrections Required," or "No Action Required."



If errors are identified in templates or application groups, issuers will not be able to submit affected application groups. To proceed, return to step 3 and make required corrections to resolve all errors. **Upload, validate, and link templates, and edit application sections or complete justifications as necessary.**

CMS conducts reviews and releases required corrections via the MPMS Module and PM Community; issuers are notified via email when new required corrections are available for issuers to access.

## Required Corrections

6

Any time CMS releases *at least one* set of required corrections, and prior to any upcoming submission deadline:

6a. Make required corrections and updates to materials

6b. Validate and cross validate as needed

6e. Submit all required application groups by clicking "Submit Group"

6c. Upload any additional materials for the upcoming submission deadline

6d. Validate and cross validate as needed

## Certification Preparation

7

Complete Final Issuer Plan Confirmation

8

Sign and return QHP Agreement

9

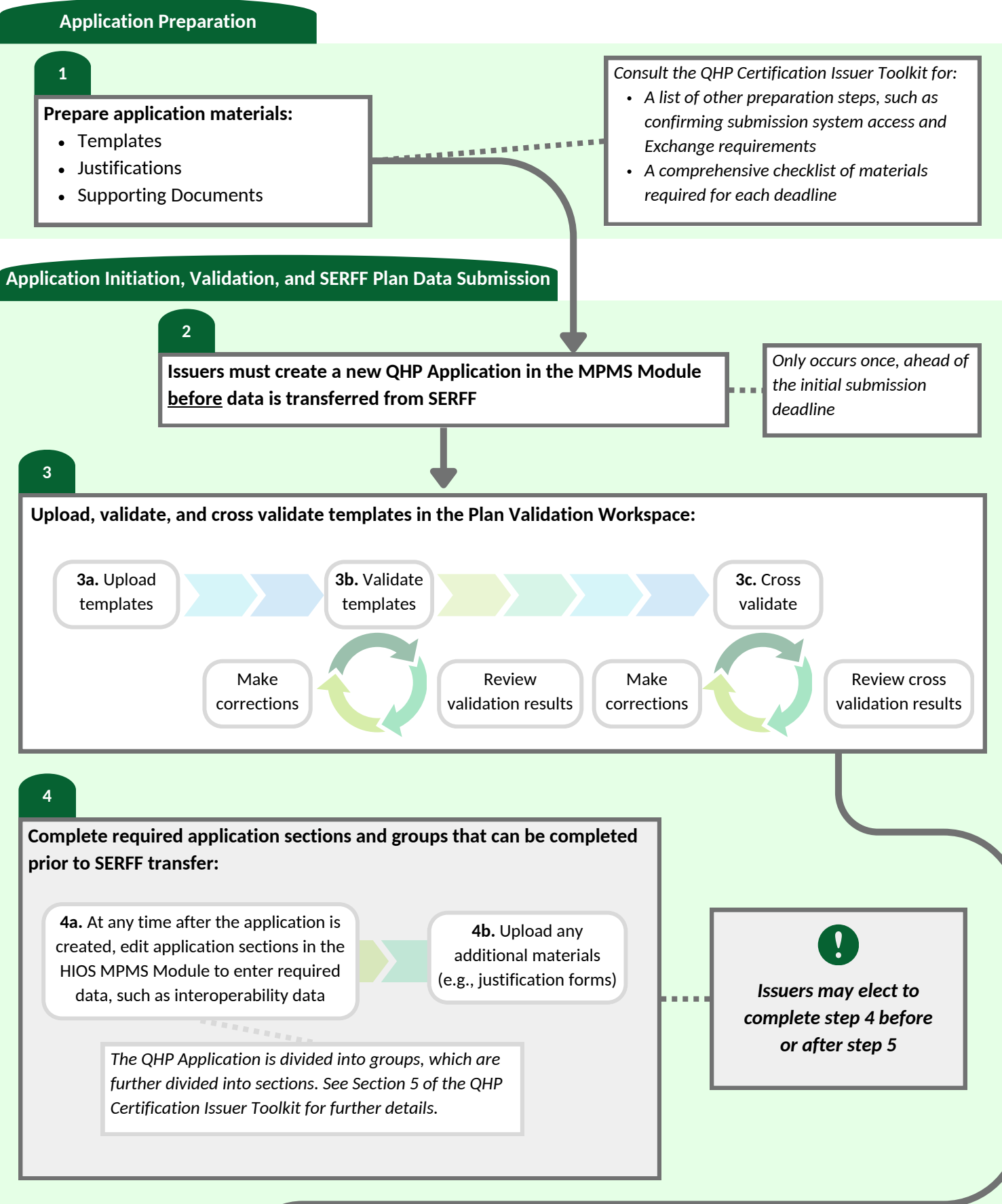
Receive Certification Notice from CMS

Off-Exchange SADPs do not complete QHP Agreements

# QHP Application Roadmap

(Issuers in States Performing Plan Management Functions and SBE-FP States)

This roadmap serves as a guide for the steps required to complete your QHP Application. Please note, issuers may have to return to earlier steps if errors are encountered or corrections are required.



5

**Submit application data to your state via SERFF:**

**5a.** Upload materials to the applicable SERFF binders

**5b.** Pass validations in SERFF Validate & Transform

**5c.** Submit binders to your state

States transfer issuers' binders from SERFF to the HIOS MPMS Module; issuers receive email notification when their plan data is successfully transferred.

6

**Complete remaining required application sections and groups following SERFF transfer:**

**6a.** Edit remaining incomplete application sections in the HIOS MPMS Module to enter required data, such as ECP, plan ID crosswalk, and the Transparency in Coverage URL

**6b.** Upload any additional materials (e.g., justification forms)

**Application Submission in MPMS Module**

7

**Issuer submits application to CMS in the MPMS Module:**

**7a.** Submit all required application groups by clicking "Submit Group"

**7b.** If applicable, address cross validation results

**7c.** Confirm application submission status

Required application groups should be in a status of "Submitted - Under Review," "Corrections Required," or "No Action Required."



Issuers are encouraged to cross validate their application data in the Plan Validation Workspace **before** attempting to submit their application, in order to identify any cross validation errors that would prevent submission.

If errors are identified in templates or application groups, issuers will not be able to submit affected application groups. To proceed, return to step 3 and make required corrections to resolve all errors. **Upload, validate, and work with your state to transfer materials, and edit application sections or complete justifications as necessary.**

If required corrections lead to changes in your application data, **re-upload the corrected materials to the applicable SERFF binders and work with your state to re-transfer materials.**

CMS conducts reviews and releases required corrections via the MPMS Module and PM Community; issuers are notified via email when new required corrections are available for issuers to access.

## Required Corrections

8

Any time CMS releases *at least one set of required corrections*, and prior to any upcoming submission deadline:

**8a.** Make required corrections and updates to materials

**8b.** Validate and cross validate as needed



**8e.** Work with state to re-transfer data as needed

**8f.** Submit all required application groups by clicking "Submit Group"

**8c.** Upload any additional materials for the upcoming submission deadline

**8d.** Validate and cross validate as needed

## Certification Preparation

9

Complete Final Issuer Plan Confirmation

10

Sign and return QHP Agreement

11

Receive Certification Notice from CMS

*Off-Exchange SADPs do not complete QHP Agreements*

## HIOS Marketplace Plan Management System (MPMS) Module

The MPMS Module is a web application where issuers can validate QHP Application 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. Issuers in states performing plan management functions and SBE-FPs will continue to submit the majority of their QHP Application data to their states through SERFF before that data is transferred by their state to the MPMS Module, where issuers will then submit their applications to CMS. Issuers in states without an Effective Rate Review Program and issuers that do not have access to SERFF utilize the HIOS URR Module as well.

The MPMS Module is divided into four 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, provide supplemental application documentation, and submit application groups. Issuers may also view review results provided by CMS based on their submitted QHP Application data.
4. **Application Tools:** This section consists of three pages. On the Application Materials page, issuers may download application materials such as the prepopulated Plan ID Crosswalk Template. The Issuer Details page is used to update Machine-Readable Index URLs. Plan Preview is a tool that lets issuers and states preview and validate QHP data as it will appear to consumers in Plan Compare on HealthCare.gov.

Additional guidance on navigating the MPMS Module is 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 to their states through SERFF before it is transferred to MPMS for submission to CMS, but will not be able to submit these data in SERFF until their application data passes all validations through SERFF Validate & Transform. To avoid submission delays that could cause them to miss CMS or state submission deadlines, **SERFF 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 data to states via SERFF.** Issuers will not be able to submit their application data to their state via SERFF until all validation errors are resolved.



# TOOLKIT

## **QHP Certification** Health Insurance Marketplace



## Section 2: Application Preparation

Last Updated: April 29, 2024



## Introduction

CMS strongly encourages all issuers to complete the tasks in this section prior to initiating their QHP Application to ensure they are prepared for the application submission process. The tasks in this section include review of available resources, confirmation of system access, and verification of any exchange requirements.

### 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 for the MPMS Module** in order to edit a QHP Application. Users within an organization may also have PM Issuer Validator, PM Issuer Viewer, or PM Network Validator roles.
    - Starting in PY2025, users with previously existing roles who wish to change roles must remove their current role before requesting a new role.
  - Obtain access to the required MPMS, Plan Finder, and URR modules, as needed.
- Obtain SERFF access**, if needed.
  - Issuers in states performing plan management functions and SBE-FPs submit their QHP Application data to their state 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 URR Tab of SERFF. This does not apply to issuers in Florida and issuers in states without an Effective Rate Review Program (Oklahoma, Tennessee, and Wyoming), and is not required for SADP issuers. Issuers in Florida, Oklahoma, Tennessee, and Wyoming must submit their rate filings in the URR Module in HIOS.
  - Issuers in Missouri, Oklahoma, Tennessee, Texas, and Wyoming do not enforce market-wide reforms. These states have notified CMS that they do not have the authority to enforce or are otherwise not enforcing ACA market reform provisions. In addition, CMS is reviewing form filing submissions for compliance with certain Consolidated Appropriations Act, 2021 provisions from issuers in Alabama, American Samoa, Arizona, Arkansas, Connecticut, Delaware, Florida, Guam, Hawaii, Illinois, Indiana, Louisiana, Massachusetts, Missouri, New Hampshire, Northern Mariana Islands, Oklahoma, Rhode Island, Tennessee, Texas, Virginia, and Wyoming. Issuers in these states must submit form filings in SERFF for CMS 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



Reference the [PM Community User Guides](#) for further information on navigating the PM Community.



## Verify Exchange Requirements

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





# TOOLKIT

## **QHP Certification** Health Insurance Marketplace



### Section 3: Application Material Requirements (By Deadline)

Last Updated: April 22, 2024



## Introduction

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

5/15/2024



### Initial Deadline

6/12/2024



### Secondary Deadline

7/17/2024



### Final Deadline

8/14/2024

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 5/15/24.

| 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 Authorization   | ✓  | N/A  | N/A  | N/A  | N/A                | N/A  |
| Business Rules Template   | ✓  | ✓    | ✓  | ✓    | ✓                  | ✓    |
| ECP Data  | ✓  | ✓    | ✓  | ✓    | ✓                  | ✓    |
| Interoperability Questions, URLs, and Justification Form  | ✓  | N/A  | ✓  | N/A  | N/A                | N/A  |
| Issuer Marketplace Information Administrative Data  | ✓  | ✓    | ✓  | ✓    | ✓                  | ✓    |
| Network Adequacy Template   | ✓  | ✓    | ✓  | ✓    | ✓                  | ✓    |
| 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 ( <i>Returning PY2024-certified issuers and new issuers receiving plans from a non-returning issuer only</i> ) | <i>Optional</i>  |      |  |      |                    |      |
| Rates Table Template  | <i>Optional; CMS will no longer accept "dummy rates," which will be flagged as validation errors</i> |      |  |      |                    |      |





## 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 6/12/24.

| 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 Authorization   | ✓  | N/A  | N/A  | N/A  | N/A                | N/A  |
| Business Rules Template   | ✓  | ✓    | ✓  | ✓    | ✓                  | ✓    |
| ECP Data  | ✓  | ✓    | ✓  | ✓    | ✓                  | ✓    |
| Interoperability Questions, URLs, and Justification Form  | ✓  | N/A  | ✓  | N/A  | N/A                | N/A  |
| Issuer Marketplace Information Administrative Data  | ✓  | ✓    | ✓  | ✓    | ✓                  | ✓    |
| Network Adequacy Template   | ✓  | ✓    | ✓  | ✓    | ✓                  | ✓    |
| Network ID Template   | ✓  | ✓    | ✓  | ✓    | ✓                  | ✓    |
| Plan ID Crosswalk Template and State Authorization <i>(Returning PY2024-certified issuers and new issuers receiving plans 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  |
| Service Area Template   | ✓  | ✓    | ✓  | ✓    | ✓                  | ✓    |
| Transparency in Coverage Template & URL   | ✓  | ✓    | ✓  | ✓    | ✓                  | ✓    |
| Rates Table Template  | <i>Optional; CMS will no longer accept “dummy rates,” which will be flagged as validation errors</i> |      |  |      |                    |      |





## 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 7/17/24.

| 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  |
| URR Template   | ✓               | N/A  | ✓  | N/A  | ✓                  | N/A  |
| Rates Table Template   | ✓               | ✓    | ✓  | ✓    | ✓                  | ✓    |
| All Other Application Materials  | <i>Optional</i> |      |  |      |                    |      |





## 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 8/14/24.

| 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 |
| All application materials, with the exception of Marketing URLs and Machine-Readable Index URLs | <i>Required if corrections were identified by CMS or your state</i> |      |  |      |                    |      |



# TOOLKIT

## **QHP Certification** Health Insurance Marketplace



### Section 4: Application Initiation and Validation

Last Updated: April 22, 2024



## Introduction

This section reviews steps issuers must take to initiate and validate their QHP Applications. All issuers are required to create a new QHP Application in the MPMS Module and use the Plan Validation Workspace to validate application data and review pre-submission review results (i.e., validation results) prior to submitting that data. After creating a new application, issuers in FFE states will proceed with linking templates to their newly created QHP Applications in the MPMS Module, while issuers in states performing plan management functions and SBE-FPs will work with their states to transfer data from SERFF to the MPMS Module for submission to CMS.



### Create a New QHP Application

Begin by navigating to the QHP Applications section of the MPMS Module. You may then select the plan year, issuer, product offering, and market coverage type for the new QHP Application you would like to create. If you have uploaded templates to the Plan Validation Workspace prior to creating a new application, you will be prompted to select any valid templates available in the Plan Validation Workspace to link to the new application. If you do not want to link files to the application at this time, instructions to link templates at a later point are included below.

**SERFF-submitting issuers will need to create a new QHP Application in the MPMS Module before their state transfers their QHP Application data from SERFF to HIOS.** Creating an application before the state transfers data ensures the correct market and product types are associated to the 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 that may include incorrect product types and market types. Creating an application also allows SERFF-submitting issuers to complete application groups that are not dependent on SERFF transfer and review required corrections to administrative data before their remaining application materials have been transferred by the state. Any application data that is subsequently transferred from SERFF to HIOS will be associated with this newly-created application.



The **How to Create a QHP Application video** is available on the [Submission Systems webpage](#) of the QHP certification website.

## Plan Validation Workspace

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 MPMS Module and/or to their state via SERFF for transfer to the MPMS Module, after which issuers will submit their transferred QHP Application to CMS.

All issuers are required 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 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 Application data to their states via SERFF for transfer to the MPMS Module.



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.



The **How to Use the Plan Validation Workspace** video is available on the [Data Validation webpage](#) of the QHP certification website.

## 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 must resolve all validation errors before submitting applications to CMS via the MPMS Module or to their state via SERFF.**

### REVIEW RESULTS



**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 **not** 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.

For additional information on both pre- and post-submission review results, view the [Data Changes and Corrections](#) section of the QHP Certification Issuer Toolkit or access the [QHP Application Review Results webpage](#) of the QHP certification website.



## Validate Your Application Data

Once issuers have logged into the MPMS Module and navigated to the Plan Validation Workspace, 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.
  - 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.
  - 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.
  - 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 <a href="#">MSD</a> .          |



## Link Templates to a QHP Application

FFE issuers are able to select any valid templates available in the Plan Validation Workspace to link them to an 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 three ways:**

- Link validated files already uploaded to the Plan Validation Workspace immediately after creating a new application** by selecting uploaded files within a pop-up window that is generated once a new application is created;
- Link files on the Application Overview page** by clicking “Link Files” at the top of the Application Overview page and selecting the desired files; 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 an updated version of an applicable template needs to be uploaded.



# TOOLKIT

## **QHP Certification**

Health Insurance Marketplace



## Section 5: Application Submission

Last Updated: April 22, 2024



## Introduction

This section outlines the different application sections and groups that make up an application and provides the specific steps issuers must take to submit their QHP Applications. CMS encourages issuers to reserve time to validate application materials and make corrections to their data prior to submitting. Once all validation errors are resolved, and data is successfully linked for issuers in FFE states or transferred from SERFF to MPMS for issuers in states performing plan management functions or SBE-FP states, issuers can proceed with submitting application groups as described below. After submitting, double check the status of your application using the instructions that follow.

## Application Sections and Groups

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

Once issuers have completed all necessary application materials, resolved all identified errors, and all applicable 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 Group                                  | Application Section           |
|--|-------------------------------|
| Issuer Attestations and Administrative Information | Administrative                |
|  | Interoperability              |
|  | Program Attestations          |
| Plan Business Rules                                | Business Rules                |
| Plan Attributes                                    | Plans & Benefits              |
|  | Prescription Drugs            |
|  | Service Area                  |
|  | Network ID                    |
|  | Essential Community Providers |
| Network Adequacy                                   |                               |
| Plan Crosswalk                                     | Plan ID Crosswalk             |
| Issuer Accreditation                               | Accreditation                 |
| Transparency Data                                  | Transparency in Coverage      |
| Plan Rates   | Rates Table                   |
|  | URR <sup>3</sup>              |
| Issuer URLs  | URL                           |

**Individual application groups will be locked (i.e., not able to be edited) while CMS conducts reviews on the submitted data.** After CMS completes reviews of one or more sections within a given group, the application group will display a status of **Corrections Required** if there are required corrections for at least one of the completed review areas. After CMS completes reviews of *all* sections within a given group, the group will display a status of **No Action Required** if there were **no** required corrections identified as part of CMS’s reviews. Issuers will receive review results as CMS completes reviews

<sup>3</sup> 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.



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.

*Please note: The Plan Attributes group is an exception to this requirement. If the Network Adequacy review has not yet been completed and CMS has completed all other reviews in the Plan Attributes group, the group will display a status of Corrections Required or No Action Required depending on CMS's reviews of the other five sections within the Plan Attributes group. Issuers will be able to edit the other five sections within the Plan Attributes group at that time.*

**New for PY2025**, issuers have the option to submit Plan ID Crosswalk, ECP, and NA data using different application materials depending on whether they are new or returning to the Exchange. Please note, starting in PY2025 ECP and NA data will be submitted separately. Reference the table below to determine the appropriate application materials for submitting these data.

### Returning Issuers

- To submit **Plan ID Crosswalk** data, generate and download a prepopulated Plan ID Crosswalk Template from the Application Materials tab of the HIOS MPMS Module.
- To submit **ECP** data, follow prompts within the ECP section of the HIOS MPMS Module to import the past plan year's provider data into the current plan year application, and make changes as necessary.
- To submit **NA** data, generate and download a prepopulated version of the NA Template containing data imported from the prior plan year from the Application Materials tab of the HIOS MPMS Module.

### New Issuers

- To submit **ECP** data, follow prompts within the ECP section of the HIOS MPMS Module to populate a list of providers.
- To submit **NA** data, download and complete a blank NA Template from Network Adequacy webpage of the QHP certification website.

### New Issuers Receiving Plans

- In rare instances and with state and CMS approval, a new issuer may submit a Plan ID Crosswalk Template to receive plans from another issuer in the same state and organization.



**CMS Recommends...** Starting in PY2025, issuers who are not returning to the Exchange do not submit a Plan ID Crosswalk Template.



### Cross Validate Your Application

After reviewing and correcting validation errors and validation warnings (if applicable), issuers should proceed with cross validating their QHP Application templates. Issuers are encouraged to cross validate within the Plan Validation Workspace; issuers will be unable to submit their application groups until resolution of any pending cross validation errors. Note: Only templates in a validation status of **No Errors Found** or **Warnings Found** can be cross validated.





**CMS Recommends...** Complete all required cross validation checks in specific MPMS sections after templates are linked or transferred from SERFF. These steps are in addition to additional cross validation checks performed on the rest of the issuer’s QHP Application.

- Within the Plans & Benefits section, run checks to identify whether Non-Standardized Plan Option Limit Exception justifications are required.
- Within the Plan ID Crosswalk section, run checks to cross validate the Plan ID Crosswalk Template against the Plans & Benefits Template and the Service Area Template.



**SERFF Tips...** Application materials uploaded to the Plan Validation Workspace may not reflect the application materials that were most recently transferred by the state from SERFF and linked to the issuer’s QHP Application. Therefore, issuers may receive different cross validation results depending on where cross validations are performed. While issuers can use the Plan Validation Workspace to check for cross validation errors, only data transferred from SERFF and linked to the issuer’s application, or data edited directly within the issuer’s application, can be submitted to CMS.

All issuers are required to cross validate their applications and remediate any identified errors prior to submission to CMS. **New for PY2025, issuers in states performing plan management functions and SBE-FP states will receive a notification when their states successfully transfer application data from SERFF to the HIOS MPMS Module;** once issuers have confirmed the appropriate data has been transferred to the HIOS MPMS Module, they are required to submit their application to CMS for review. When issuers hit the “Submit Group” button in the MPMS Module, cross validation checks will automatically run on the applicable data and display to the issuer. Issuers must resolve any outstanding cross validation errors and warnings and attempt to resubmit. If changes to application data originally submitted via SERFF are necessary based on cross validation errors and warnings, issuers must work with their states to retransfer data before attempting to submit in MPMS again.

- Select “Cross Validate”** at the bottom of the Plan Validation Workspace.
  - As a reminder, SERFF-submitting issuers are encouraged to cross validate their application data in the Plan Validation Workspace **before** attempting to submit an application, in order to identify any cross validation errors that would prevent submission.
- 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. If errors or warnings are identified, issuers are able to view detailed validation messages. Issuers can download these results by selecting Download (CSV).
- Re-run cross validation checks** in the Plan Validation Workspace and if applicable, **run additional checks** in specific application sections until all errors are resolved.
  - Following any changes to the Plans & Benefits Template or the Service Area Template, run cross validation checks within the Plans & Benefits section to identify whether Non-Standardized Plan Option Limit Exception justifications are required.
  - Following any changes to the Plan ID Crosswalk section, the Plans & Benefits Template, or the Service Area Template, run cross validation checks within the Plan ID Crosswalk section.



**SERFF Tips...** If required corrections following cross validation lead to changes in your application data, reupload the corrected materials to the applicable SERFF binders and work with your state to retransfer materials.





## 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, follow the steps below to ensure your application is 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.



Reference the [submission system user guides](#) posted on the QHP certification website for further information on navigating HIOS.



The [How to Submit a QHP Application video](#) is available on the [Application Submission webpage](#) of the QHP certification website.

### Issuers in FFEs

- Create a new application** in the MPMS Module.
- Upload** application materials to the MPMS Module.
- Validate** application templates in the Plan Validation Workspace.
- 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 groups** by the relevant submission deadline.

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

- Create a new application** in the MPMS Module.
- Validate** application templates in the Plan Validation Workspace within the MPMS Module.
- Upload** the necessary validated materials to the applicable SERFF binders.
- Submit binders** to your state via SERFF.
- Confirm** that your state has transferred the most recent data for all plans to CMS, after email notification of transfer is received.
- Complete and upload** any additional materials to the MPMS Module.
- Submit** application groups in the QHP Application page of the MPMS Module. Cross validations will automatically run on the applicable data and display to the issuer.
- Resubmit application data in SERFF for retransfer to HIOS and resubmission to CMS as needed**, if changes are necessary to address any cross validation errors and warnings.
- Submit all required application groups** by the relevant submission deadline.

*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.

New for PY2025, issuers in states performing plan management functions and SBE-FPs **must submit all required application groups relevant for each deadline by clicking “Submit Group” in the MPMS Module** following their state’s transfer of binders from SERFF.



## Check Your Submission Status

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

### All Issuers

- Log into the MPMS Module and confirm each application group that is required for the relevant submission deadline has a status of **Submitted – Under Review, Corrections Required, or No Action Required**.
  - If there are application groups with a status of **“Not Started”** or **“In Progress”** due for the relevant deadline, issuers must complete these groups and click the Submit Group button to complete application submission.
- 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.
  - If you are not able to locate the issuer ID for the current plan year, the application has not yet been created.
- Locate the **“Certification”** status.
  - **Early Bird and Initial Deadlines:** This status should read either **“Pending Review”** or **“Pending Review and Submission of Rates.”** **Please note it may take up to 24 hours for this status to update.**
    - 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 either you updated your application in the MPMS Module or your state transferred these data to CMS (if applicable).



**SERFF Tips...** SERFF issuers should check with their state prior to each deadline to ensure the state has transferred all SERFF binders, and then must submit their applications to CMS. **If issuers make changes based on cross validation errors and warnings received when submitting to CMS, work with your state to retransfer data before attempting to submit to CMS again.**





# TOOLKIT

## **QHP Certification** Health Insurance Marketplace



## Section 6: Data Changes and Corrections

Last Updated: April 22, 2024



## Introduction

This section explains the pre- and post-submission review results that issuers will receive throughout the certification cycle, and the process by which issuers can make data changes and corrections. 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 <sup>4</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 (with the exception of transparency in coverage and interoperability 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.   |

<sup>4</sup> Required authorization to change QHP data, and the process for requesting authorization, differs by state Exchange type.



## 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.



### 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. |

Revisit [Section 4: Application Initiation and Validation](#) for descriptions of pre-submission review results.

### 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 <a href="#">timeline</a> . 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 [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.



Issuers will be notified each time CMS completes a review, including reviews that do not result in required corrections for the issuer. If the application group indicated in the notification of a completed review shows a status of “No Action Required,” there are no corrections required as a result of the completed review.

- 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, and submit the most up to date data in the MPMS Module.



# TOOLKIT

## **QHP Certification** Health Insurance Marketplace



## Section 7: Certification Preparedness

Last Updated: May 3, 2024



## Introduction

Throughout the certification cycle, issuers complete a variety of activities to prepare for QHP certification, such as using Plan Preview to identify plan display errors, completing final issuer plan confirmation, submitting rates data, submitting URLs, and signing QHP Agreements. This section provides an overview of these additional activities.

## Plan Preview

Plan Preview is a tool in the HIOS MPMS Module that lets issuers and states preview and validate QHP data as it will appear to consumers in Plan Compare on HealthCare.gov.



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.



PY2025 Plan Preview will be available by spring

2024 and can be used as a resource for issuers throughout the plan year.



HIOS issuers and states will be able to use Plan

Preview when all groups, except for the Plan Rates and Issuer URL groups are in "Submitted – Under Review," "No Action Required," or "Corrections Required" status in the MPMS Module.



The Plan Preview User Guide is part of the [MPMS](#)

[User Guide](#), but the [Plan Preview webpage](#) provides several additional resources.



Reference the [Plan Preview webpage](#) and [Plan Preview FAQs webpage](#) of the QHP certification website for guidance on using Plan Preview.



### Use Plan Preview to Identify Plan Errors

- Access Plan Preview Module via the MPMS Module.
- Enter sample rating scenarios to view details and rates for associated Individual and SHOP plans.
  - Only plans that have been submitted in the MPMS Module 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

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. | October 2, 2023       |
| 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 31, 2024      |
| 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, 2024      |
| HHS-approved QHP Enrollee Survey vendor securely submits the QHP Enrollee Survey response data to CMS (on behalf of the QHP issuer).                                | May 17, 2024          |
| QHP issuer submits the validated QRS clinical measure data, with attestation, to CMS via NCQA's IDSS.   | June 14, 2024         |
| QHP issuers preview the 2024 QHP quality rating information.  | August/September 2024 |

## Rate Review Requirements (by Deadline)

All QHP issuers (for both QHPs and non-QHPs) offering a single risk pool plan in the individual, small group, and/or merged market 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 states without an Effective Rate Review Program (OK, TN, and WY) to submit proposed rate filing justifications to CMS.   | June 3, 2024     |
| Submission deadline for issuers in states with an Effective Rate Review Program to submit proposed rate filing justifications to CMS and the state.   | July 17, 2024    |
| Deadline for states with an Effective Rate Review Program with an Exchange served by the HealthCare.gov platform to finalize rate filing justifications that include a QHP.                                       | August 14, 2024  |
| Deadline for states with an Effective Rate Review Program with a State-based Exchange that does not use the HealthCare.gov platform to finalize determinations for rate filing justifications that include a QHP. | October 14, 2024 |



States that can access SERFF, and states with an Effective Rate Review Program, are required to file the PY2025 URR 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 MPMS Module.



**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 PY2025 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.



The **How to Submit URL data video** is available on the [URL Submission webpage](#) of the QHP certification website.



### 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 2025 plan year.

| URL Type  | Submission Location                                 | Submission Deadline | Live and Active Deadline |
|---|---|---------------------|--------------------------|
| Transparency in Coverage                                    | Transparency in Coverage section of the MPMS Module | June 12, 2024*      | Upon URL Submission      |
| Marketing (SBC, Plan Brochure, Payment, Formulary, Network) | URLs section of the MPMS Module                     | September 18, 2024  | September 18, 2024       |
| Machine-Readable Index.JSON                                 | Issuer Details tab of the MPMS Module               | September 18, 2024  | September 18, 2024       |

*\*If you choose to submit a QHP Application by the Early Bird submission deadline, Transparency in Coverage URLs are required by 5/15/24.*



### QHP Agreement Signing

Issuers offering on-Exchange QHPs or SADPs in the Federally-facilitated Exchanges (FFE), including issuers in states performing plan management functions, must sign and submit a **QHP Certification Agreement and Privacy and Security Agreement (the QHP Certification Agreement)** and a **Senior Officer Acknowledgement**. Please note that off-Exchange only SADP issuers do not sign the QHP Certification Agreement.

Agreements will be sent to issuers via DocuSign. Once you receive your agreement, take **one** of the following actions:

**If you are a person authorized to enter into agreement with CMS for the listed issuer:**

- Click "Review Documents."
- Click "Continue."
- Scroll through the QHP Certification Agreement and Senior Officer Acknowledgment documents to review and complete the required fields as indicated by the red boxes.
- Click "Finish" at the top of the screen once you have completed the required fields.



If you are *not* a person authorized to enter into agreement with CMS for the listed issuer, *do not forward this email directly*, but follow the steps below to re-assign the documents to an individual who is authorized:

- Click “Review Documents.”
- Click “Other Actions” and from the dropdown menu, select “Assign to Someone Else.”
- Enter the email address and name for the person who is authorized to enter into agreement with CMS, 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.



**CMS Recommends...** Confirming that your parent organization’s PM Community contact list is up to date so that relevant members receive the appropriate communications.



**A How to Complete the QHP Certification Agreement Process video is available** and will be circulated to issuers alongside the agreements.

## Certification Notices

CMS will send Certification Notices to issuers at the conclusion of the QHP Application certification process, including the final list of certified QHPs and a CMS-countersigned agreement. **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 Countersigned QHP Agreements and Final List of Certified QHPs

- 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.



# TOOLKIT

## **QHP Certification** Health Insurance Marketplace



## Section 8: Appendices

Last Updated: April 22, 2024



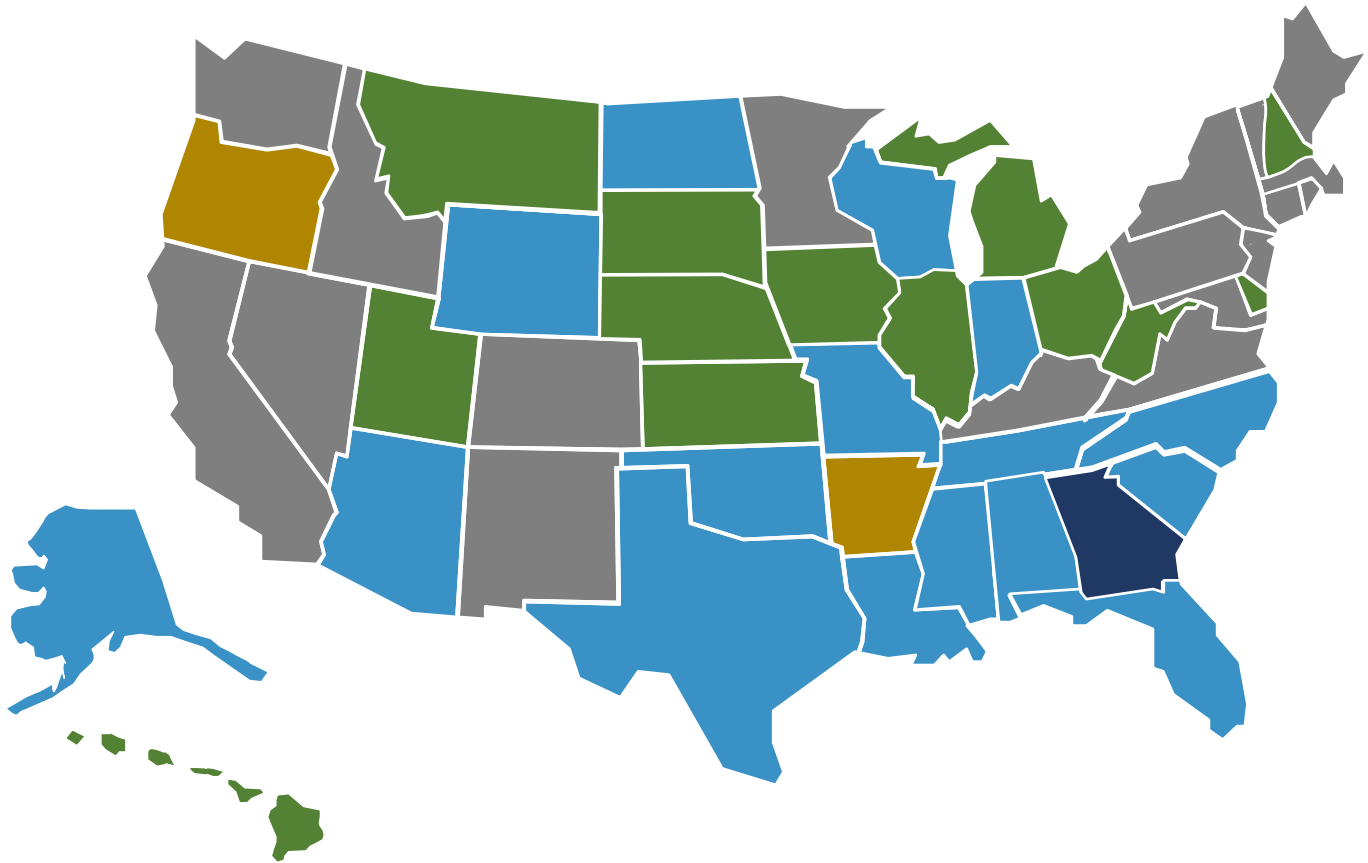
## Appendix A: Acronyms

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

- ACA: Affordable Care Act
- 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



## Appendix B: State Exchange Model Map



<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 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 Data   | HIOS MPMS Module        | HIOS MPMS Module^   |
| EHB-Substituted Benefit 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   | HIOS MPMS Module        | HIOS MPMS Module  |
| Network Adequacy Data  | HIOS MPMS Module        | HIOS MPMS Module^   |
| Network ID Template  | HIOS MPMS Module        | HIOS MPMS Module  |
| Network URL  | HIOS MPMS Module        | HIOS MPMS Module  |
| Non-Standardized Plan Option Limit Exceptions                                    | 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 State Authorization  | HIOS MPMS Module        | HIOS MPMS Module  |
| Plan ID Crosswalk Template   | HIOS MPMS Module        | HIOS MPMS Module  |
| 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 Attestation Response Form              | N/A                     | SERFF   |
| Transparency in Coverage Template  | HIOS MPMS Module        | SERFF   |



| Application Material                        | Issuers in FFEs  | Issuers in states performing plan management functions, SBE-FPs |
|---|------------------|---|
| 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.

^Issuers in states performing plan management functions and SBE-FPs will be required to submit a template for NA data through SERFF.



## 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*                              | ✓                                 | ✓                                   |                                      |
| Non-Discrimination (Clinical Appropriateness)  | ✓                                 | ✓                                   |                                      |
| Non-Discrimination (Cost Sharing) *            |                                   |                                     | ✓                                    |
| Non-Discrimination (Formulary Outlier) *       |                                   |                                     | ✓                                    |
| Non-Discrimination (Treatment Protocol) *      |                                   |                                     | ✓                                    |
| Non-Standardized Plan Option Limit Exceptions* | ✓                                 | ✓                                   |                                      |
| Plan ID Crosswalk*                             | ✓                                 | ✓                                   |                                      |
| Plan Marketing Name                            |                                   |                                     | ✓                                    |
| Program Attestations                           | ✓                                 |                                     |                                      |
| QIS*   |                                   |                                     | ✓                                    |
| QRS*   |                                   |                                     | ✓                                    |
| SADP EHB Benchmark                             | ✓                                 | ✓                                   |                                      |
| Service Area                                   | ✓                                 | ✓                                   |                                      |
| Silver/Gold                                    | ✓                                 |                                     |                                      |
| Standardized Plan Options                      | ✓                                 |                                     |                                      |
| Transparency in Coverage                       | ✓                                 | ✓                                   |                                      |
| URL*   | ✓                                 |                                     | ✓                                    |

\*CMS will not release required corrections for these review areas prior to the initial submission deadline, even if all applicable plan data is submitted to CMS for review by the Early Bird submission deadline. Issuers are still strongly encouraged to take advantage of the Early Bird submission deadline to receive other review results that can be addressed ahead of the initial submission deadline.

