

Qualified Health Plan Issuer Application Instructions

Plan Year 2025

**Extracted section:
Section 2C: Program Attestations**

Section 2C: Program Attestations

1. Introduction

In the Program Attestations section of MPMS, issuers filing via HIOS attest to their intent to comply with Federally-facilitated Exchange (FFE) requirements (Figure 2C-1). It includes the following attestations:

- Attestations required of both medical QHP and stand-alone dental plan (SADP) issuers
- Attestations required of medical QHP issuers only
- Attestations required of SADP issuers only.

The instructions for this section apply to the following issuer types:

- QHP
- SADP

See Appendix D for additional information.

Issuers must respond to all attestations and save the section before being able to submit the group.

If the issuer is in a state that performs plan management functions, complete the [State Partnership Exchange Issuer Program Attestation Response Form](#) and submit it via the National Association of Insurance Commissioners' (NAIC's) System for Electronic Rates & Forms Filing (SERFF).

Figure 2C-1. Program Attestations Application Section

Program Attestations

Applicants must agree to all attestations in order to complete an Issuer application and participate in the FFE.

| Application | Plan Year | Issuer | Product Offering | Market Coverage Type |
|-----------------|-----------|---|------------------|----------------------|
| 10055TX-2025-09 | 2025 | 10055 - TX - Union Security Insurance Company | QHP & SADP | Individual & SHOP |

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Program Attestations Introduction

QHP & SADP Attestation

QHP Attestation

SADP Attestation

1. Applicant agrees to adhere to all of the certification standards and operational requirements applicable to applicant in 45 Code of Federal Regulation (CFR) Parts 153, 155, and 156.

This attestation applies to all QHPs and SADPs that an issuer is submitting for certification for the next plan year. All issuers who wish to offer either certified QHPs or SADPs on the FFEs are required to agree to the above attestation.

I agree the issuer will comply with the above statement.

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2. Data Requirements

To complete this section, the following is needed:

1. State Partnership Exchange Issuer Program Attestation Response Form: Only required if the issuer is in a state that performs plan management functions and is submitting in SERFF. Save the form using the naming convention in Table C-1.

3. Quick Reference

Key Changes for 2025

- ◆ No changes for the 2025 QHP Application.

Tips for the Program Attestations Section

- ◆ For HIOS submitting issuers, only those attestations that are applicable for the submitted plan types will be displayed (e.g., if only medical QHPs are offered for certification, only those attestations relevant for medical QHPs will be displayed).
- ◆ “Dual Issuer” refers to an issuer that offers both a medical QHP and a SADP under the same HIOS Issuer ID.
- ◆ The issuer must respond to all attestations.
- ◆ For HIOS submitting issuers, the issuer must agree with each attestation displayed.
- ◆ For issuers in states performing plan management functions:
 - Use the *State Partnership Exchange Issuer Program Attestation Response Form*.
 - If the issuer only offers medical QHPs for certification, respond **Not Applicable** to the attestations required in the SADP-only issuers subsection.
 - If the issuer only offers SADPs for certification, respond **Not Applicable** to the attestations required in the medical QHP-only issuers subsection.

Additional Resources

- ◆ There is a [supporting document](#) for this section (for issuers in states performing plan management functions).
- ◆ There are no instructional videos for this section.
- ◆ There are no templates for this section.

4. Detailed Section Instructions

To participate in the FFE, issuers must respond to the following:

| Attestation Area | Steps |
|--|---|
| Attestations required of both medical QHP and SADP issuers | All issuers must agree with this attestation to offer certified medical QHPs or SADPs: <ul style="list-style-type: none"> ◆ All HIOS submitting issuers must check the box agreeing to comply. ◆ All issuers in states performing plan management functions must respond Yes. |
| Attestations required of medical QHP issuers only | Issuers applying for certification of medical QHPs must agree with this attestation to offer certified medical QHPs: <ul style="list-style-type: none"> ◆ HIOS submitting issuers offering medical QHPs must check the box agreeing to comply. ◆ Issuers in states performing plan management functions offering medical QHPs must respond Yes. If the issuer is not applying to offer medical QHPs, select Not Applicable. |
| Attestations required of SADP issuers only | Issuers applying for certification of SADPs must agree with these attestations to offer certified SADPs: <ul style="list-style-type: none"> ◆ HIOS submitting issuers offering SADPs must check the boxes agreeing to comply. ◆ Issuers in states performing plan management functions offering SADPs must respond Yes to each attestation. If the issuer is not applying to offer SADPs, select Not Applicable. |

The specific attestations are shown below.

| Attestation Area | Attestation |
|--|---|
| Attestations required of both medical QHP and SADP issuers | Applicant agrees to adhere to all of the certification standards and operational requirements applicable to applicant in 45 <i>Code of Federal Regulations</i> (CFR) Parts 153, 155, and 156. |

| Attestation Area | Attestation |
|---|--|
| Attestations required of medical QHP issuers only | Applicant agrees to adhere to all applicable requirements in 45 CFR Parts 146, 147, 155, and 156. |
| Attestations required of SADP issuers only | Applicant agrees to adhere to all of the certification standards and operational requirements applicable to applicant in 45 CFR Parts 155 and 156. |

This concludes the Program Attestations section of the QHP Application Instructions.