Qualified Health Plan Issuer Application Instructions

Plan Year 2025

Extracted section:
Section 2M: Transparency in Coverage

Section 2M: Transparency in Coverage

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

- QHP
- SADP

See Appendix D for additional information.

1. Introduction

This document provides instructions for qualified health plan (QHP) issuers submitting Transparency in Coverage data for PY2025.[1]

Issuers submitting a QHP Application for PY2025 must make accurate and timely disclosures of transparency reporting information to the appropriate Exchange, the Secretary of HHS, and the state insurance commissioner, and make the information available to the public.[2,3] These instructions apply to issuers applying for QHP certification in Federally-facilitated Exchanges (FFEs) in PY2025, including issuers in FFEs where states perform plan management functions and State-based Exchanges on the Federal Platform (SBE-FPs). This includes:

- On-Exchange medical QHPs
- On-Exchange stand-alone dental plans (SADPs)
- Off-Exchange-only SADPs seeking QHP certification
- Small Business Health Options Program (SHOP) QHPs.

Note: If the issuer is in a State-based Exchange (SBE) state that is not on the federal platform, they are not required to submit Transparency in Coverage data at this time.

Exchange Type	Transparency in Coverage Reporting Required?
FFE	Yes
FFE with state performing plan management functions	Yes
SBE (using own IT platform)	No
SBE-FP (using federal IT platform)	Yes

2. Data Requirements

To complete this section, the following are needed:

- Information on whether the issuer was on the Exchange in 2023
- Health Insurance Oversight System (HIOS) Issuer IDs and all PY2025 plan IDs
- Number of PY2023 claims received, denied, and resubmitted
- Number of PY2023 internal and external appeals
- Claims Payment Policy and Other Information URL (“Transparency in Coverage URL”).

To apply for PY2025 QHP certification, except in an SBE state not on the federal platform, the issuer must submit a Transparency in Coverage Template that includes all on-Exchange PY2025 plan IDs. The QHP Application cannot be submitted without this template. However, only certain on-Exchange QHPs and SADPs will report numerical Transparency in Coverage claims data for dates of service from January 1, 2023, through

[1] Office of Management and Budget Control Number CMS-10572.
[2] Section 2715A of the Public Health Service (PHS) Act extends the transparency reporting provisions under Section 1311(e)(3) to non-grandfathered groups and issuers offering group or individual coverage, except for a plan not offered on an Exchange.
[3] The implementation of the transparency reporting requirements under Section 1311(e)(3) for QHP issuers as described in this document does not apply to non-Exchange coverage, including health insurance issuers offering group and individual health insurance coverage and non-grandfathered group health plans. Transparency reporting for those plans and issuers is set forth under 2715A of the PHS Act, incorporated into Section 715(a)(1) of the Employee Retirement Income Security Act and Section 9815(a)(1) of the Internal Revenue Code (Code) and will be addressed separately.

December 31, 2023. Off-Exchange SADP issuers and on-Exchange issuers not on the Exchange in PY2023 should complete the template indicating reporting requirements are not applicable. See for more information.

- The Transparency in Coverage Template must include all on-Exchange PY2025 plan IDs and a separate Transparency in Coverage Template must be submitted for each unique HIOS Issuer ID. Only report *claims data* for plan IDs that were offered on the Exchange in PY2023 and will be offered on Exchange again in PY2025. Claims for plan IDs that were offered on the Exchange in PY2023 but will no longer be offered on the Exchange in PY2025 must be included within the total claims counts on the *Issuer Level* tab of the template. If a PY2025 plan ID was not offered on the Exchange in PY2023, but will be offered on the Exchange in PY2025, include it in the *Plan Level* tab of the template but indicate that PY2023 claims data is not applicable for that plan ID by entering "N/A" in the relevant fields. See for a summary of Transparency in Coverage reporting requirements.

If a QHP is available both on and off the Exchange, the issuer is required to report claims data only for the on-Exchange enrollees.

Table 2M-1. Summary of Transparency in Coverage Reporting Requirements

Plan Type	Transparency in Coverage Template Required?	Transparency in Coverage Claims Data Required?	Transparency in Coverage URL Required?
On-Exchange QHP that was offered in PY2023	Yes	Yes. Do not include or count claims data for off-Exchange QHP enrollment.	Yes
On-Exchange SADP that was offered in PY2023	Yes	Yes. Do not include claims data for off-Exchange SADP enrollment.	Yes
Off-Exchange SADP that was offered in PY2023	Yes	No. Do not include claims data associated with any off-Exchange plans or plan IDs.	No
On-Exchange QHP that was not offered in PY2023	Yes	No. Note as N/A in the template.	Yes
On-Exchange SADP that was not offered in PY2023	Yes	No. Note as N/A in the template.	Yes

3. Quick Reference

Key Changes for 2025
◆ No changes for the 2025 QHP Application.

Tips for the Transparency Section
◆ Issuers applying to offer on-Exchange plans for PY2025 that did not offer on-Exchange plans in PY2023 must still submit a Transparency in Coverage Template. ◆ Issuer level data for returning issuers must be non-numeric for in- and out-of-network claims received and denied but can be zero for issuer level in- and out-of-network claims appealed and resubmitted. ◆ Do not include off-Exchange–only plans in the *Plan Level* tab of the Transparency in Coverage Template. ◆ Required data elements are identified by an asterisk (*) next to the field name. ◆ Complete a separate template for each unique HIOS Issuer ID. ◆ Use only the tabs provided in the Transparency in Coverage Template. Do not add additional tabs, rows, or columns. ◆ Enter all on-Exchange plan level data in the *Plan Level Data* tab. One plan ID should be captured in each row. Each plan ID listed should be a distinct 14-character ID. ◆ Check the templates for completeness and data validity before submitting by clicking Validate on the *Issuer Level Data* tab. ◆ For issuers that submit via the System for Electronic Rates & Forms Filing (SERFF), one identical Transparency in Coverage Template containing all plan IDs should be submitted in each submission binder. For example, if an issuer submits an Individual Market binder and a SHOP Market binder, both the Individual Market plan IDs and the SHOP Market plan IDs should be included in one Transparency in Coverage Template and submitted in each binder. Note that this is different from the process used for other templates submitted as part of the QHP Application and certification process, wherein each binder should include a unique template.

Additional Resources
◆ There are no supporting documents for this section. ◆ There are instructional videos for this section. ◆ There are templates for this section.

4. Detailed Section Instructions

Perform the following steps to complete the Transparency in Coverage Template (see Figure 2M-1 and Figure 2M-2).

Note for issuers that submit via SERFF: Issuers should complete only one Transparency in Coverage Template containing all necessary information and submit that template in all SERFF binders. The Centers for Medicare & Medicaid Services (CMS) will only process the most recent Transparency in Coverage Template transferred by the state, and all other Transparency in Coverage Template data or versions will be overwritten. Include the same Transparency in Coverage Template across all SERFF binders. For example, if an issuer has an Individual Market SERFF binder with 3 on-Exchange plan IDs and a SHOP Market SERFF binder with 7 on-Exchange plan IDs, they should submit an identical Transparency in Coverage Template that contains all 10 on-Exchange plan IDs in both SERFF binders.

4.1 Defining and Reporting a Claim

For all claims data fields on the *Issuer Level* and *Plan Level* tabs, the following definitions apply:

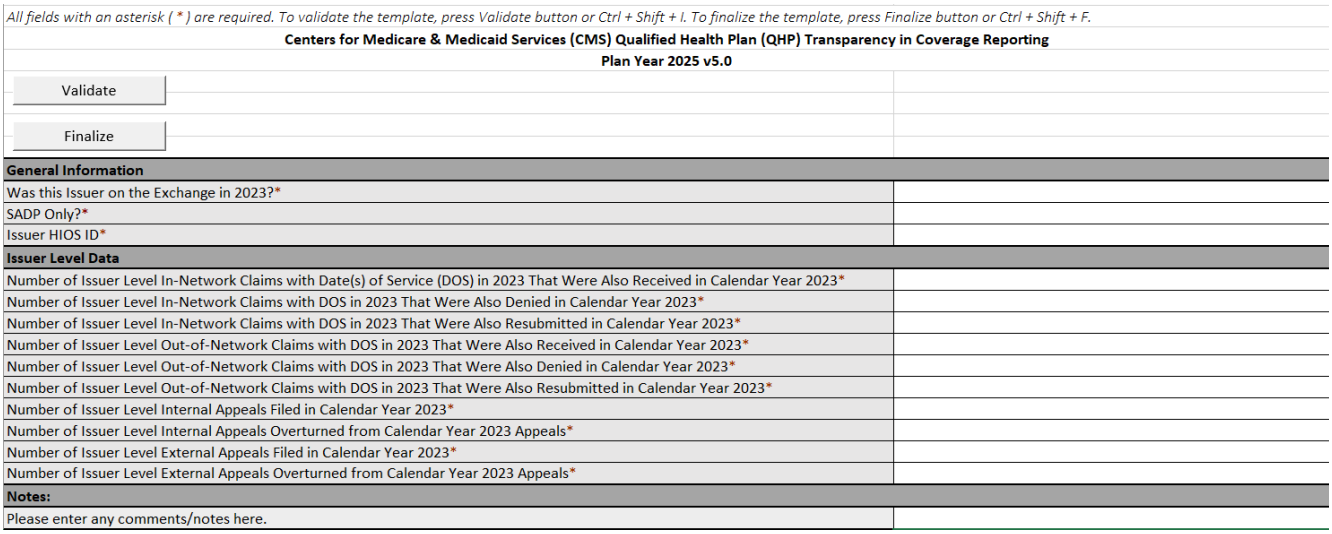
- A claim is any individual claim line of service within a bill for services (medical and pharmacy, including pharmacy point of sale) or a request for payment for services and benefits (e.g., a bill containing 10 lines of service will be counted as 10 claims).
- An In-Network provider is any provider, such as a hospital, physician, or pharmacy, that is contracted to be part of the issuer's network (such as a health maintenance organization [HMO] or preferred provider organization [PPO]).
- An Out-of-Network provider is any provider, such as a hospital, physician, or pharmacy, that is not contracted to be part of your network (such as an HMO or PPO).

Additionally, when calculating claim counts:

- Include those for all QHPs that fall under the reporting HIOS Issuer ID. Submit a separate template for each HIOS Issuer ID, if applicable.
- When reporting claims, calculate claim counts by dates of service (DOS) and report claims data with a single numerical value.
- Include pediatric vision claims and pediatric dental claims.

4.2 Issuer Level Data Tab

Figure 2M-1. Transparency in Coverage Template



*All fields with an asterisk (*) are required. To validate the template, press Validate button or Ctrl + Shift + I. To finalize the template, press Finalize button or Ctrl + Shift + F.*

Centers for Medicare & Medicaid Services (CMS) Qualified Health Plan (QHP) Transparency in Coverage Reporting

Plan Year 2025 v5.0

Validate

Finalize

General Information	
Was this Issuer on the Exchange in 2023?*	
SADP Only?*	
Issuer HIOS ID*	
Issuer Level Data	
Number of Issuer Level In-Network Claims with Date(s) of Service (DOS) in 2023 That Were Also Received in Calendar Year 2023*	
Number of Issuer Level In-Network Claims with DOS in 2023 That Were Also Denied in Calendar Year 2023*	
Number of Issuer Level In-Network Claims with DOS in 2023 That Were Also Resubmitted in Calendar Year 2023*	
Number of Issuer Level Out-of-Network Claims with DOS in 2023 That Were Also Received in Calendar Year 2023*	
Number of Issuer Level Out-of-Network Claims with DOS in 2023 That Were Also Denied in Calendar Year 2023*	
Number of Issuer Level Out-of-Network Claims with DOS in 2023 That Were Also Resubmitted in Calendar Year 2023*	
Number of Issuer Level Internal Appeals Filed in Calendar Year 2023*	
Number of Issuer Level Internal Appeals Overturned from Calendar Year 2023 Appeals*	
Number of Issuer Level External Appeals Filed in Calendar Year 2023*	
Number of Issuer Level External Appeals Overturned from Calendar Year 2023 Appeals*	
Notes:	
Please enter any comments/notes here.	

The values submitted on the *Issuer Level* tab must include claims for all QHPs in 2023, including QHPs not returning to the Exchange in 2025. Therefore, the sum of plan level claims values reported elsewhere in the template may be less than the issuer level claims values reported.

If the issuer was not on the Exchange in 2023 or will offer only off-Exchange SADPs for 2025, please mark **N/A** for all claims data fields.

General Information	Steps
Was this issuer on the Exchange in 2023?*	Enter **Yes** or **No** to indicate whether or not this issuer was on the Exchange in 2023. ◆ If **Yes**, the issuer must fill out claims and appeals data. ◆ If **No**, the issuer must enter **N/A** in the claims and appeals data fields. ◆ If the issuer offers only off-Exchange SADPs, enter **No**.
Issuer HIOS ID*	Enter the five-digit HIOS Issuer ID. Submit a separate template for each HIOS Issuer ID, if applicable.
SADP Only?*	Select **Yes** or **No** from the drop-down menu to indicate whether the issuer offers only SADPs.

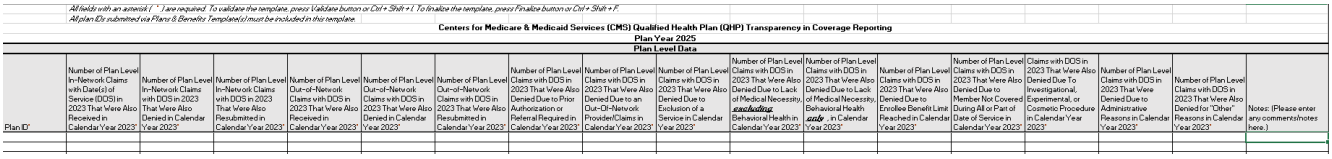
Issuer Level Data	Steps
Number of Issuer Level In-Network Claims with DOS in 2023 That Were Also Received in Calendar Year 2023*	Enter the number of issuer level claims the issuer received that asked for a payment or reimbursement by or on behalf of an in-network health care provider. ◆ Claims that were pended or initially denied and subsequently resubmitted for any reason should only be counted as one claim in this category. For example, each of the following counts as one claim: ▪ An issuer denies a claim for lack of sufficient information to process the claim. The provider then submits sufficient information, and the issuer denies the claim because it lacks medical necessity. The enrollee appeals the denial, and the denial is overturned. The issuer then approves the claim and pays for the service. ▪ An issuer denies a claim for being an excluded service. The claim is then resubmitted and denied again for the same reason. Do not include out-of-network claims.
Number of Issuer Level In-Network Claims with DOS in 2023 That Were Also Denied in Calendar Year 2023*	Enter the number of issuer level claims the issuer received that asked for a payment or reimbursement by or on behalf of an in-network health care provider that you subsequently denied. ◆ Count denied claims based on their final adjudication. For example, each of the following counts as one denied claim: ▪ An issuer denies a claim for lack of sufficient information to process the claim. The provider then submits sufficient information, and the issuer denies the claim because it lacks medical necessity. ▪ An issuer denies a claim for being an excluded service. The claim is then resubmitted and denied again for the same reason. The enrollee appeals the decision but fails to overturn the denial. ◆ Count a claim that was denied for more than one reason as one denied claim (e.g., no prior authorization received and not a covered service). Do not count each denial reason separately. ◆ Include all denials in the total number of claims denied in calendar year 2023, including: ▪ Pediatric vision and dental denials, including SADPs ▪ Denials because of ineligibility ▪ Denials caused by incorrect submission ▪ Denials caused by incorrect billing ▪ Duplicate claims. Do not include out-of-network claims.
Number of Issuer Level In-Network Claims with DOS in 2023 That Were Also Resubmitted in Calendar Year 2023*	Enter the number of issuer level claims resubmissions received that asked for a payment or reimbursement by or on behalf of an in-network health care provider. ◆ Any claim that is resubmitted one or more times after the initial submission should be counted as one resubmitted claim, regardless of the outcome of the claim. This means that all of the following should count as one resubmission: ▪ A claim that was submitted, denied, resubmitted, denied, resubmitted, denied, resubmitted, approved (i.e., resubmitted on three occasions, ultimately approved) ▪ A claim that was submitted, denied, resubmitted, denied, resubmitted, denied (i.e., resubmitted on two occasions, ultimately denied) ▪ A claim that was submitted, denied, resubmitted, approved (i.e., resubmitted on only one occasion, ultimately approved) ▪ A claim that was submitted, denied, resubmitted, denied (i.e., resubmitted on only one occasion, ultimately denied). ◆ Regardless of who initiates the resubmission—the issuer, the enrollee, or someone resubmitting on behalf of the enrollee—any claim that is resubmitted one or more times after initial submission should be counted as one resubmitted claim.

Issuer Level Data	Steps
	◆ Duplicate claims do not count as resubmitted claims, assuming the duplicates are denied for being repetitious of a previously received claim that has been, or is in the process of being, adjudicated. Do not include out-of-network claims.
Number of Issuer Level Out-of-Network Claims with DOS in 2023 That Were Also Received in Calendar Year 2023*	Enter the number of issuer level claims the issuer received that asked for a payment or reimbursement by or on behalf of an out-of-network health care provider. ◆ Claims that were pended or initially denied and subsequently resubmitted for any reason should only be counted as one claim in this category. For example, each of the following counts as one claim: ▪ An issuer denies a claim for lack of sufficient information to process the claim. The provider then submits sufficient information, and the issuer denies the claim because it lacks medical necessity. The enrollee appeals the denial, and the denial is overturned. The issuer then approves the claim and pays for the service. ▪ An issuer denies a claim for being an excluded service. The claim is then resubmitted and denied again for the same reason. Do not include in-network claims.
Number of Issuer Level Out-of-Network Claims with DOS in 2023 That Were Also Denied in Calendar Year 2023*	Enter the number of issuer level claims the issuer received that asked for a payment or reimbursement by or on behalf of an out-of-network health care provider that the issuer subsequently denied. ◆ Count denied claims based on their final adjudication. For example, each of the following counts as one denied claim: ▪ An issuer denies a claim for lack of sufficient information to process the claim. The provider then submits sufficient information, and the issuer denies the claim because it lacks medical necessity. ▪ An issuer denies a claim for being an excluded service. The claim is then resubmitted and denied again for the same reason. The enrollee appeals the decision but fails to overturn the denial. ◆ Count a claim that was denied for more than one reason as one denied claim (e.g., no prior authorization received and not a covered service). Do not count each denial reason separately. ◆ Include all denials in the total number of claims denied in calendar year 2023, including: ▪ Pediatric vision and dental denials, including SADPs ▪ Denials because of ineligibility ▪ Denials caused by incorrect submission ▪ Denials caused by incorrect billing ▪ Duplicate claims. Do not include in-network claims.
Number of Issuer Level Out-of-Network Claims with DOS in 2023 That Were Also Resubmitted in Calendar Year 2023*	Enter the number of issuer level claims resubmissions the issuer received that asked for a payment or reimbursement by or on behalf of an out-of-network health care provider. ◆ Any claim that is resubmitted one or more times after the initial submission should be counted as one resubmitted claim, regardless of the outcome of the claim. This means that all the following should count as one resubmission: ▪ A claim that was submitted, denied, resubmitted, denied, resubmitted, denied, resubmitted, approved (i.e., resubmitted on three occasions, ultimately approved) ▪ A claim that was submitted, denied, resubmitted, denied, resubmitted, denied (i.e., resubmitted on two occasions, ultimately denied) ▪ A claim that was submitted, denied, resubmitted, approved (i.e., resubmitted on only one occasion, ultimately approved) ▪ A claim that was submitted, denied, resubmitted, denied (i.e., resubmitted on only one occasion, ultimately denied).

Issuer Level Data	Steps
	◆ Regardless of who initiates the resubmission—the issuer, the enrollee, or someone resubmitting on behalf of the enrollee—any claim that is resubmitted one or more times after initial submission should be counted as one resubmitted claim. ◆ Duplicate claims do not count as resubmitted claims, assuming the duplicates are denied for being repetitious of a previously received claim that has been, or is in the process of being, adjudicated. Do not include in-network claims.
Number of Issuer Level Internal Appeals Filed in Calendar Year 2023*	Enter the number of requests for internal appeals involving adverse determinations the issuer received from or on behalf of consumers pursuant to 45 *Code of Federal Regulations* (CFR) 147.136. Consumers request internal review to have an adverse determination reviewed with respect to a denial of payment, in whole or in part, for a service or treatment, or a rescission of coverage. Include appeals regarding services with DOS in 2022 that the issuer received, fully adjudicated, and completed in 2023. Do not include appeals that were subsequently withdrawn. CMS expects the number of issuer level internal appeals reported here to be less than the sum of the *Number of Issuer Level In-Network Claims with DOS in 2023 That Were Also Denied in Calendar Year 2023* and the *Number of Issuer Level Out-of-Network Claims with DOS in 2023 That Were Also Denied in Calendar Year 2023*.
Number of Issuer Level Internal Appeals Overturned from Calendar Year 2023 Appeals*	Enter the number of final determinations adverse to consumers that were overturned on request for internal review, in whole or in part, pursuant to 45 CFR 147.136. Consumers request internal review to have an adverse determination reviewed with respect to a denial of payment, in whole or in part, for a service or treatment, or a rescission of coverage.
Number of Issuer Level External Appeals Filed in Calendar Year 2023*	Enter the number of requests for external appeals of final adverse determinations sent by or on behalf of consumers to an external review organization pursuant to 45 CFR 147.136. Consumers request an external appeal to have an adverse benefit determination (or final internal adverse benefit determination) reviewed by an independent third-party reviewer. Include appeals regarding services with DOS in 2023 that the issuer received, fully adjudicated, and completed in 2023. Do not include appeals that were subsequently withdrawn.
Number of Issuer Level External Appeals Overturned from Calendar Year 2023 Appeals*	Enter the number of final determinations adverse to consumers that were overturned on request for external review, in whole or in part, pursuant to 45 CFR 147.136. Consumers request an external appeal to have an adverse benefit determination (or final internal adverse benefit determination) reviewed by an independent third-party reviewer.

4.3 Plan Level Data Tab

Figure 2M-2. Transparency in Coverage Template—Plan Level Tab


All fields with an asterisk (*) are required. To validate the template, press Validate button or Ctrl + Shift + I. To finalize the template, press Finalize button or Ctrl + Shift + F.
All plan IDs submitted via Plans & Benefits Template(s) must be included in this template.
Centers for Medicare & Medicaid Services (CMS) Qualified Health Plan (QHP) Transparency in Coverage Reporting
Plan Year 2025
Plan Level Data
Plan ID*
Number of Plan Level In-Network Claims with Date(s) of Service (DOS) in 2023 That Were Also Received in Calendar Year 2023*
Number of Plan Level In-Network Claims with DOS in 2023 That Were Also Denied in Calendar Year 2023*
Number of Plan Level In-Network Claims with DOS in 2023 That Were Also Resubmitted in Calendar Year 2023*
Number of Plan Level Out-of-Network Claims with DOS in 2023 That Were Also Received in Calendar Year 2023*
Number of Plan Level Out-of-Network Claims with DOS in 2023 That Were Also Denied in Calendar Year 2023*
Number of Plan Level Out-of-Network Claims with DOS in 2023 That Were Also Resubmitted in Calendar Year 2023*
Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Prior Authorization or Referral Required in Calendar Year 2023*
Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to an Out-Of-Network Provider/Claims in Calendar Year 2023*
Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Exclusion of a Service in Calendar Year 2023*
Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Lack of Medical Necessity, excluding Behavioral Health in Calendar Year 2023*
Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Lack of Medical Necessity, Behavioral Health only, in Calendar Year 2023*
Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Enrollee Benefit Limit Reached in Calendar Year 2023*
Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Member Not Covered During All or Part of Date of Service in Calendar Year 2023*
Claims with DOS in 2023 That Were Also Denied Due To Investigational, Experimental, or Cosmetic Procedure in Calendar Year 2023*
Number of Plan Level Claims with DOS in 2023 That Were Denied Due to Administrative Reasons in Calendar Year 2023*
Number of Plan Level Claims with DOS in 2023 That Were Also Denied for "Other" Reasons in Calendar Year 2023*
Notes: (Please enter any comments/notes here.)

Issuers must include all on-Exchange plan IDs that are present in their PY2024 QHP Application in the Transparency in Coverage Template**.** If a plan is off-Exchange or did not exist in PY2023, enter **N/A** in all Plan Level data fields. All other on-Exchange plans (including SADPs, except for SADPs offered by SADP-only issuers when reporting the *Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Lack of Medical Necessity, Behavioral Health only, in Calendar Year 2023*) must enter a numerical value in all fields; 0 is acceptable.

Note: Report all reasons a claim is denied. A claim can be denied for more than one reason. Therefore, the sum of the reasons why claims were denied may either be equal to or greater than the sum of the *Number of In-Network Plan Level Claims with DOS in 2023 That Were Also Denied in Calendar Year 2023* and *Number of Out-of-Network Plan Level Claims with DOS in 2023 That Were Also Denied in Calendar Year 2023.*

PY2024 Plan Data	Steps
2025 On-Exchange Plan ID*	Enter the 14-character PY2025 on-Exchange plan ID on the *Plan Level Data* tab. The plan ID is composed of the five-digit HIOS Issuer ID, the two-character state abbreviation, and the seven unique digits for the plan (e.g., 12345AZ1234567). If there is more than one PY2025 plan ID to report for a single HIOS Issuer ID, add each plan line by line in the *Plan Level Data* tab. All plan variants should be rolled up to one plan ID or line in the template. For example: ◆ Reported claims for 12345AZ1234567 would include claims that fall under this plan ID from members on all associated plan variants: ▪ 12345AZ1234567-01: 100 claims ▪ 12345AZ1234567-02: 500 claim ▪ 12345AZ1234567-03: 200 claims ▪ 12345AZ1234567-04: 50 claims. Reporting for plan ID 12345AZ1234567 should be entered as one plan ID in one row of the template with a total of 850 claims (100 + 500 + 200 + 50) for the applicable data field.
Number of Plan Level In-Network Claims with DOS in 2023 That Were Also Received in Calendar Year 2023*	Enter the number of plan level claims the issuer received that asked for a payment or reimbursement by or on behalf of an in-network health care provider. ◆ Claims that were pending or initially denied for additional information and subsequently paid for any reason, as shown in Footnote 4 should only be counted once. For example, the following each count as one claim: ▪ An issuer denies a claim for lack of sufficient information to process the claim. The provider then submits sufficient information, and the issuer denies the claim because it lacks medical necessity. The enrollee appeals the denial and the denial is overturned. The issuer then approves the claim and pays for the service. ▪ An issuer denies a claim for being an excluded service. The claim is then resubmitted and denied again for the same reason. Do not include out-of-network claims. The total issuer level claims received data may include plans not offered in 2025. Therefore, the plan level claims total may not total the issuer level claims.
Number of Plan Level In-Network Claims with DOS in 2023 That Were Also Denied in Calendar Year 2023[4]	Enter the number of plan level claims the issuer received that asked for a payment or reimbursement by or on behalf of an in-network health care provider that the issuer subsequently denied.

[4] For example, if one of an issuer's plans were to receive 20,000 claims and deny 3,000 of those claims, the issuer would further report the reasons for the 3,000 denials in one or more of 10 denial categories:

1. Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Prior Authorization or Referral Required in Calendar Year 2023
2. Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to an Out-of-Network Provider/Claims in Calendar Year 2023
3. Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Exclusion of a Service in Calendar Year 2023
4. Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Lack of Medical Necessity, Including Behavioral Health in Calendar Year 2023
5. Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Lack of Medical Necessity, Excluding Behavioral Health in Calendar Year 2023
6. Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Enrollee Benefit Limit Reached in Calendar Year 2023
7. Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Member Not Covered During All or Part of Date of Service in Calendar Year 2023
8. Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due To Investigational, Experimental, or Cosmetic Procedure in Calendar Year 2023

PY2024 Plan Data	Steps
(Plan Level Claims Denied)*	◆ Count denied claims based on their final adjudication. For example, each of the following counts as one denied claim: ▪ An issuer denies a claim for lack of sufficient information to process the claim. The provider then submits sufficient information, and the issuer denies the claim because it lacks medical necessity. ▪ An issuer denies a claim for being an excluded service. The claim is then resubmitted and denied again for the same reason. The enrollee appeals the decision but fails to overturn the denial. ◆ Count a claim that was denied for more than one reason as one denied claim (e.g., no prior authorization received and not a covered service). Do not count each denial reason separately. ◆ Include all denials in the total number of claims denied in calendar year 2023, including: ▪ Pediatric vision and dental denials, including for SADPs ▪ Denials because of ineligibility ▪ Denials caused by incorrect submission ▪ Denials caused by incorrect billing ▪ Duplicate claims. The total number of plan level claims denied in the specified calendar year should also be accounted for in the 10 Plan Level Claims Denial categories. Note: CMS expects the sum of the 10 Plan Level Claims Denial categories to be greater than or equal to the sum of the *Number of Plan Level In-Network Claims with DOS in 2023 That Were Also Denied in Calendar Year 2023* and the *Number of Plan Level Out-of-Network Claims with DOS in 2023 That Were Also Denied in Calendar Year 2023* because individual claims may be denied for more than one reason.
Number of Plan Level In-Network Claims with DOS in 2023 That Were Also Resubmitted in Calendar Year 2023*	Enter the number of plan level claim resubmissions the issuer received that asked for a payment or reimbursement by or on behalf of an in-network health care provider. ◆ Any claim that is resubmitted one or more times after the initial submission should be counted as one resubmitted claim, regardless of the outcome of the claim. This means that all of the following should count as one resubmission: ▪ A claim that was submitted, denied, resubmitted, denied, resubmitted, denied, resubmitted, approved (i.e., resubmitted on three occasions, ultimately approved) ▪ A claim that was submitted, denied, resubmitted, denied, resubmitted, denied (i.e., resubmitted on two occasions, ultimately denied) ▪ A claim that was submitted, denied, resubmitted, approved (i.e., resubmitted on only one occasion, ultimately approved) ▪ A claim that was submitted, denied, resubmitted, denied (i.e., resubmitted on only one occasion, ultimately denied). ◆ Regardless of who initiates the resubmission—the issuer, the enrollee, or someone resubmitting on behalf of the enrollee—any claim that is resubmitted one or more times after initial submission should be counted as one resubmitted claim. ◆ Duplicate claims do not count as resubmitted claims, assuming the duplicates are denied for being repetitious of a previously received claim that has been, or is in the process of being, adjudicated. The total issuer level claims received data may include plans not offered in 2025. Therefore, the plan level claims total may not total the issuer level claims.

9. Number of Plan Level Claims with DOS in 2023 That Were Also Denied for Administrative Reasons in Calendar Year 2023
10. Number of Plan Level Claims with DOS in 2023 That Were Also Denied for "Other" Reasons in Calendar Year 2023.

In this example, the issuer would only report that 3,000 plan-level claims were denied, but could report more than 3,000 denial reasons in the 10 reporting categories if any claims were denied for more than one reason.

PY2024 Plan Data	Steps
Number of Plan Level Out-of-Network Claims with DOS in 2023 That Were Also Received in Calendar Year 2023*	Enter the number of plan level claims the issuer received that asked for a payment or reimbursement by or on behalf of an out-of-network health care provider. Claims that were pending or initially denied for additional information and subsequently paid for any reason, as shown in Footnote 4 should only be counted once. For example, the following each count as one claim: ▪ An issuer denies a claim for lack of sufficient information to process the claim. The provider then submits sufficient information, and the issuer denies the claim because it lacks medical necessity. The enrollee appeals the denial and the denial is overturned. The issuer then approves the claim and pays for the service. ▪ An issuer denies a claim for being an excluded service. The claim is then resubmitted and denied again for the same reason. Do not include out-of-network claims. The total issuer level claims received data may include plans not offered in 2025. Therefore, the plan level claims total may not total the issuer level claims.
Number of Plan Level Out-of-Network Claims with DOS in 2023 That Were Also Denied in Calendar Year 2023 (Plan Level Claims Denied)*	Enter the number of plan level claims the issuer received that asked for a payment or reimbursement by or on behalf of an out-of-network health care provider that the issuer subsequently denied. Count denied claims based on their final adjudication. For example, each of the following counts as one denied claim: ▪ An issuer denies a claim for lack of sufficient information to process the claim. The provider then submits sufficient information, and the issuer denies the claim because it lacks medical necessity. ▪ An issuer denies a claim for being an excluded service. The claim is then resubmitted and denied again for the same reason. The enrollee appeals the decision but fails to overturn the denial. ◆ Count a claim that was denied for more than one reason as one denied claim (e.g., no prior authorization received and not a covered service). Do not count each denial reason separately. ◆ Include all denials in the total number of claims denied in calendar year 2023, including: ▪ Pediatric vision and dental denials, including for SADPs ▪ Denials because of ineligibility ▪ Denials caused by incorrect submission ▪ Denials caused by incorrect billing ▪ Duplicate claims. The total number of plan level claims denied in the specified calendar year should also be accounted for in the 10 Plan Level Claims Denial categories. Note: CMS expects the sum of the 10 Plan Level Claims Denial categories to be greater than or equal to the *Number of Plan Level Claims with DOS in 2023 That Were Also Denied in Calendar Year 2023* because individual claims may be denied for more than one reason.
Number of Plan Level Out-of-Network Claims with DOS in 2023 That Were Also Resubmitted in Calendar Year 2023*	Enter the number of plan level claim resubmissions the issuer received that asked for a payment or reimbursement by or on behalf of an out-of-network health care provider. Any claim that is resubmitted one or more times after the initial submission should be counted as one resubmitted claim, regardless of the outcome of the claim. This means that all of the following should count as one resubmission: ▪ A claim that was submitted, denied, resubmitted, denied, resubmitted, denied, resubmitted, approved (i.e., resubmitted on three occasions, ultimately approved) ▪ A claim that was submitted, denied, resubmitted, denied, resubmitted, denied (i.e., resubmitted on two occasions, ultimately denied) ▪ A claim that was submitted, denied, resubmitted, approved (i.e., resubmitted on only one occasion, ultimately approved) ▪ A claim that was submitted, denied, resubmitted, denied (i.e., resubmitted on only one occasion, ultimately denied).

PY2024 Plan Data	Steps
	◆ Regardless of who initiates the resubmission—the issuer, the enrollee, or someone resubmitting on behalf of the enrollee—any claim that is resubmitted one or more times after initial submission should be counted as one resubmitted claim. ◆ Duplicate claims do not count as resubmitted claims, assuming the duplicates are denied for being repetitious of a previously received claim that has been, or is in the process of being, adjudicated. The total issuer level claims resubmitted data may include plans not offered in 2025. Therefore, the plan level claims total may not total the issuer level claims.
Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Prior Authorization or Referral Required in Calendar Year 2023 (Plan Level Claims Denied)*	Note: The following claim denial reporting instructions for columns H, I, J, K, L, M, N, O, P, & Q of the *Plan Level* tab are different from the instructions for claim denial reporting on the *Issuer Level* tab and columns C & F of the *Plan Level* tab. Rather than reporting denied claims based on their final adjudication, report each incidence of the following denials that occur throughout the life of a claim. For example: ◆ For the *Issuer Level* tab and columns C & F of the *Plan Level* tab: ▪ If a claim is denied for any reason, then resubmitted and denied again without further resubmission, it will count as one denied claim. ◆ For columns H, I, J, K, L, M, N, O, P, & Q: ▪ If a claim is denied for lacking a prior authorization and being an excluded service, then resubmitted and denied again for lacking a prior authorization and being an excluded service, it will count twice in column H (*Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Prior Authorization or Referral Required in Calendar Year 2023*) and twice in column J (*Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Exclusion of a Service in Calendar Year 2023*). Issuers may deny claims multiple times for multiple reasons throughout the life of a claim. For this section, enter the number of in-network plan level denials the issuer issued for non-emergency–related claims for service that required prior authorization, preauthorization, referral, prior approval, or precertification, from when a claim was first received to its final adjudication. Issuers should include the following claims (individual claim line of service items): ◆ Total number of claims denied for services or supplies received after prior or preauthorization, referral, prior approval, or pre-certification was denied. ◆ Total number of claims denied for services or supplies received when a consumer failed to obtain a required prior or preauthorization, referral, prior approval, or precertification. ◆ Include all instances of this type of denial throughout the life of a claim in the total reported for this column. For example: ▪ If a claim is denied for requiring a prior authorization, resubmitted, and denied again for the same reason, it will count as two denials in this category. ▪ If a claim is denied for requiring a prior authorization, resubmitted with the required documentation, and paid, it will count as one denial in this category. Do not include out-of-network claims.

PY2024 Plan Data	Steps
Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to an Out-of-Network Provider/Claims in Calendar Year 2023 (Plan Level Claims Denied)*	Issuers may deny claims multiple times for multiple reasons throughout the life of a claim. For this section, enter the number of plan level denials the issuer issued for claims for service from outside the plan's network of health care providers if the plan has a closed network, from when a claim was first received to its final adjudication. Issuers should include the following claims (individual claim line of service items): ◆ Total number of claims denied for point of service benefits provided by someone (e.g., health care provider, clinic, pharmacy, or hospital) that is not contracted to be in the plan's (HMO or closed network plans) network. ◆ Include all instances of this type of denial throughout the life of a claim in the total reported for this column. For example: ▪ If a claim is denied for services from an out-of-network provider, resubmitted, and denied again for the same reason, it will count as two denials in this category. ▪ If a claim is denied for services from an out-of-network provider, resubmitted with updated documentation, and paid, it will count as one denial in this category. ◆ Do not include in-network claims.
Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Exclusion of a Service in Calendar Year 2023 (Plan Level Claims Denied)*	Issuers may deny claims multiple times for multiple reasons throughout the life of a claim. For this section, enter the number of in-network plan level denials the issuer issued for claims for excluded or non-covered services. Issuers should include the following claims (individual claim line of service items): ◆ Total number of claims denied because certain services, tests, treatments, admissions, supplies, etc., are excluded, not covered, or limited under the plan, including claims denied because a drug is not on the formulary. ◆ Include all instances of this type of denial throughout the life of a claim in the total reported for this column. For example: ▪ If a claim is denied as an excluded service, resubmitted, and denied again for the same reason, it will count as two denials in this category. ▪ If a claim is denied as an excluded service, resubmitted with updated documentation, and paid, it will count as one denial in this category.
Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Lack of Medical Necessity, Excluding Behavioral Health, in Calendar Year 2023 (Plan Level Claims Denied)*	Issuers may deny claims multiple times for multiple reasons throughout the life of a claim. For this section, enter the number of in-network plan level denials the issuer issued for claims for health care services or supplies that do not meet accepted standards to diagnose or treat illness, injury, condition, disease, or the symptoms of these. Include the following denials for lack of medical necessity (individual claim line of service item): ◆ Payment for services related to medical surgical diagnosis, including medical and pharmacy point of sales. ◆ Use the following United States Pharmacopeia (USP) drug categories to count pharmacy claims excluding behavioral health: ▪ Analgesics ▪ Anesthetics ▪ Antibacterials ▪ Anticonvulsants ▪ Antidementia Agents ▪ Antiemetics ▪ Antifungals ▪ Antigout ▪ Antimigraine Agents ▪ Antimyasthenic Agents ▪ Antimycobacterials ▪ Antineoplastics ▪ Antiparasitics

PY2024 Plan Data	Steps
	▪ Antiparkinson Agents ▪ Antipasticity Agents ▪ Antivirals ▪ Blood Glucose Regulators ▪ Blood Products and Modifiers ▪ Cardiovascular Agents ▪ Central Nervous System Agents ▪ Dental and Oral Agents ▪ Dermatological Agents ▪ Electrolytes/Minerals/Metals/Vitamins ▪ Gastrointestinal Agents ▪ Genetic or Enzyme or Protein Disorder: Replacement, Modifiers, Treatment ▪ Genitourinary Agents ▪ Hormonal Agents, Stimulant/Replacement/Modifying (Adrenal) ▪ Hormonal Agents, Stimulant/Replacement/Modifying (Pituitary) ▪ Hormonal Agents, Stimulant/Replacement/Modifying (Prostaglandins) ▪ Hormonal Agents, Stimulant/Replacement/Modifying (Sex Hormone/Modifiers) ▪ Hormonal Agents, Stimulant/Replacement/Modifying (Thyroid) ▪ Hormonal Agents, Suppressant (Adrenal) ▪ Hormonal Agents, Suppressant (Pituitary) ▪ Hormonal Agents, Suppressant (Thyroid) ▪ Immunological Agents ▪ Inflammatory Bowel Disease Agents ▪ Metabolic Bone Disease Agents ▪ Ophthalmic Agents ▪ Otic Agents ▪ Respiratory Tract/Pulmonary Agents ▪ Skeletal Muscle Relaxants ▪ Sleep Disorder Agents. Do not include the following claims: ◆ Behavioral or mental health claims or payment for services. ▪ Behavioral health claims or payments for benefits associated with mental health or substance use disorders. ▪ Mental health claims or payments for benefits associated with mental health conditions as classified in the current versions of the Diagnostic and Statistical Manual of Mental Disorders (DSM) and the International Classification of Disease (ICD). Report claims as behavioral or mental health if the primary or principal diagnosis code reported is classified as behavioral or mental health according to the current version of the DSM. ▪ Substance use disorder claims or payments for benefits associated with the treatment or diagnosis of substance use conditions as classified in the current versions of the DSM and the ICD. ◆ Include all instances of this type of denial throughout the life of a claim in the total reported for this column. For example: ▪ If a claim is denied because it lacks medical necessity, resubmitted, and denied again for the same reason, it will count as two denials in this category. ▪ If a claim is denied because it lacks medical necessity, resubmitted with updated documentation, and paid, it will count as one denial in this category.

PY2024 Plan Data	Steps
Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Lack of Medical Necessity, Behavioral Health only, in Calendar Year 2023 (Plan Level Claims Denied)*	Issuers may deny claims multiple times for multiple reasons throughout the life of a claim. For this section, enter the number of in-network plan level denials the issuer issued for claims for health care services or supplies that do not meet the acceptable standards to diagnose or treat illness, injury, condition disease, or the symptoms of these related to behavioral or mental health, from when a claim was first received to its final adjudication. If a plan is off-Exchange, an SADP offered by an issuer offering only SADPs, and/or a plan that did not exist in PY2023, enter **N/A**. All other on-Exchange plans, including SADPs offered by an issuer offering both SADPs and QHPs, must enter a numerical value in this field; 0 is acceptable. ◆ Issuers should include the following claims denials for lack of medical necessity (individual claim line of service items): Behavioral or mental health claims or payment for services, including pharmacy claims and pharmacy point of sales related to behavioral health. ▪ Behavioral health claims or payments for benefits associated with mental health or substance use disorders. ▪ Mental health claims or payments for benefits associated with mental health conditions as classified in the current versions of the DSM and the ICD. Report claims as behavioral or mental health if the primary or principal diagnosis code reported is classified as behavioral or mental health according to the current version of the DSM. ▪ Substance use disorder claims or payments for benefits associated with the treatment or diagnosis of substance use conditions as classified in the current versions of the DSM and the ICD as well as federal or state guidelines. ◆ Issuers should use the following USP drug categories to count pharmacy claims including behavioral health: ▪ Anti-addiction/Substance Abuse Treatment Agents ▪ Antidepressants ▪ Antipsychotics ▪ Anxiolytics ▪ Bipolar Agents. ◆ Include all instances of this type of denial throughout the life of a claim in the total reported for this column. For example: ▪ If a claim is denied because it lacks medical necessity, resubmitted, and denied again for the same reason, it will count as two denials in this category. ▪ If a claim is denied because it lacks medical necessity, resubmitted with updated documentation, and paid, it will count as one denial in this category. Do not include payment for services related to medical surgical diagnosis, including medical and pharmacy point of sales.
Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Enrollee Benefit Limit Reached in Calendar Year 2023 (Plan Level Claims Denied)*	Issuers may deny claims multiple times for multiple reasons throughout the life of a claim. For this section, enter the number of in-network plan level denials the issuer issued for claims denied due to the beneficiary reaching their benefit limit. Issuers should include the following claims (individual claim line of service items): ◆ Total number of claims denied because a beneficiary has reached or exceeded the benefit limit for their plan. This item refers to any annual limit on benefits (including monetary limits, cost maximums, quantity limits, visit limits, etc.). ◆ Include all instances of this type of denial throughout the life of a claim in the total reported for this column. For example: ▪ If a claim is denied because the beneficiary reached their benefit limit, resubmitted, and denied again for the same reason, it will count as two denials in this category. ▪ If a claim is denied because the beneficiary reached their benefit limit, resubmitted with updated documentation, and paid, it will count as one denial in this category.

PY2024 Plan Data	Steps
Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Member Not Covered During All or Part of Date of Service in Calendar Year 2023 (Plan Level Claims Denied)*	Issuers may deny claims multiple times for multiple reasons throughout the life of a claim. For this section, enter the number of in-network plan level denials the issuer issued for claims denied due to beneficiary enrollment status. Issuers should include the following claims (individual claim line of service items): ◆ Total number of claims denied because of the beneficiary's enrollment status. ◆ Include all instances of this type of denial throughout the life of a claim in the total reported for this column. For example: ▪ If a claim is denied because of beneficiary enrollment status, resubmitted, and denied again for the same reason, it will count as two denials in this category. ▪ If a claim is denied because of beneficiary enrollment status, resubmitted with updated documentation, and paid, it will count as one denial in this category.
Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due To Investigational, Experimental, or Cosmetic Procedure in Calendar Year 2023 (Plan Level Claims Denied)*	Issuers may deny claims multiple times for multiple reasons throughout the life of a claim. For this section, enter the number of in-network plan level denials the issuer issued for claims denied because the procedure was investigational, cosmetic, or experimental. Issuers should include the following claims (individual claim line of service items): ◆ Total number of claims denied because the procedure for which the claim is submitted is considered investigational, cosmetic, or experimental. ◆ Include all instances of this type of denial throughout the life of a claim in the total reported for this column. For example: ▪ If a claim is denied because the relevant procedure was investigational, experimental, or cosmetic, resubmitted, and denied again for the same reason, it will count as two denials in this category. ▪ If a claim is denied because the relevant procedure was investigational, experimental, or cosmetic, resubmitted with updated documentation, and paid, it will count as one denial in this category.
Number of Plan Level Claims with DOS in 2023 That Were Also Denied for Administrative Reasons in Calendar Year 2023 (Plan Level Claims Denied)*	Issuers may deny claims multiple times for multiple reasons throughout the life of a claim. For this section, enter the number of in-network plan level claims the issuer denied for administrative reasons. Issuers should include the following claims (individual claim line of service items): ▪ Duplicate Claim ▪ Missing/Insufficient Information ▪ Untimely Claim Filing ▪ Billing Provider Not Approved ▪ Coordination of Benefit ▪ Inconsistent Procedure Code/Diagnosis ▪ Workers Comp/Liability Issue ▪ Paid by Auto or Other Insurance ▪ Unable to identify patient. ◆ Include all instances of this type of denial throughout the life of a claim in the total reported for this column. For example: ▪ If a claim is denied for administrative reasons, resubmitted, and denied again for the same reason, it will count as two denials in this category. ▪ If a claim is denied for administrative reasons, resubmitted with updated documentation, and paid, it will count as one denial in this category.
Number of Plan Level Claims with DOS in 2023 That Were Also Denied for "Other" Reasons in Calendar Year 2023 (Plan Level Claims Denied)*	Issuers may deny claims multiple times for multiple reasons throughout the life of a claim. For this section, enter the number of in-network plan level denials the issuer issued for claims rejected for reasons other than those specified in the above categories, from when a claim was first received to its final adjudication. ◆ Include all instances of *this type of* denial throughout the life of a claim in the total reported for this column. Do not include out-of-network claims.

Verify the following before submitting the PY2025 Transparency in Coverage Template:

- The number of issuer level In-Network Claims Received reported on the *Issuer Level* tab is greater than or equal to the sum of in-network claims received across all plan IDs on the *Plan Level* tab.
- The number of issuer level In-Network Claims Denied reported on the *Issuer Level* tab is greater than or equal to the sum of in-network claims denied reported across all plan IDs on the *Plan Level* tab.
- The number of issuer level In-Network Claims Resubmitted reported on the *Issuer Level* tab is greater than or equal to the sum of in-network claims resubmitted across all plan IDs on the *Plan Level* tab.
- The number of issuer level Out-of-Network Claims Received reported on the *Issuer Level* tab is greater than or equal to the sum of out-of-network claims received across all plan IDs on the *Plan Level* tab.
- The number of issuer level Out-of-Network Claims Denied reported on the *Issuer Level* tab is greater than or equal to the sum of out-of-network claims denied reported across all plan IDs on the *Plan Level* tab.
- The number of issuer level Out-of-Network Claims Resubmitted reported on the *Issuer Level* tab is greater than or equal to the sum of out-of-network claims resubmitted across all plan IDs on the *Plan Level* tab.
- The sum of issuer level In-Network and Out-of-Network Claims Denied reported on the *Issuer Level* tab is greater than or equal to the number of "Issuer Level Internal Appeals Filed" in calendar year 2023.
- The sum of plan level reasons for denied claims (columns H, I, J, K, L, M, N, O, P, & Q) is greater than or equal to the sum of reported in-network and out-of-network claims denied (columns C & F) for each plan ID.

4.4 Transparency in Coverage Template Submission for Issuers Not Subject to Reporting Requirements

To apply for PY2025 QHP certification, the issuer must submit a Transparency in Coverage Template that includes all the issuer's on-Exchange PY2025 plan IDs. The QHP Application cannot be submitted without this template. However, the following issuers are not required to submit Transparency in Coverage data as described in 4.2 Issuer Level Data Tab and 4.3 Plan Level Data Tab:

- Issuers with no PY2023 on-Exchange plans
- Off-exchange certified SADPs.

Off-Exchange-only issuers (non-QHP) that are not seeking certification are not required to submit a Transparency in Coverage Template and do not have a data reporting requirement at this time.

This section describes how to submit the Transparency in Coverage Template without reporting numerical transparency data. Issuers must submit their **HIOS Issuer ID** in the *Issuer Level Data* tab () and all PY2025 plan IDs in the *Plan Level Data* tab (). **N/A** must be entered in all other data fields as indicated below.

4.4.1 Issuers With No Data Reporting Requirement—Issuer Level Data Tab

General Information	Expected Value
Was this issuer on the Exchange in 2023?*	No
Issuer HIOS ID*	Enter the five-digit HIOS Issuer ID.

Issuer Level Data	Expected Value
Number of Issuer Level In-Network Claims with DOS in 2023 That Were Also Received in Calendar Year 2023*	**N/A**
Number of Issuer Level In-Network Claims with DOS in 2023 That Were Also Denied in Calendar Year 2023*	**N/A**

Issuer Level Data	Expected Value
Number of Issuer Level In-Network Claims with DOS in 2023 That Were Also Resubmitted in Calendar Year 2023*	**N/A**
Number of Issuer Level Out-of-Network Claims with DOS in 2023 That Were Also Received in Calendar Year 2023*	**N/A**
Number of Issuer Level Out-of-Network Claims with DOS in 2023 That Were Also Denied in Calendar Year 2023*	**N/A**
Number of Issuer Level Out-of-Network Claims with DOS in 2023 That Were Also Resubmitted in Calendar Year 2023*	**N/A**
Number of Issuer Level Internal Appeals Filed in Calendar Year 2023*	**N/A**
Number of Issuer Level Internal Appeals Overturned from Calendar Year 2023 Appeals*	**N/A**
Number of Issuer Level External Appeals Filed in Calendar Year 2023*	**N/A**
Number of Issuer Level External Appeals Overturned from Calendar Year 2023 Appeals*	**N/A**

Figure 2M-3. Sample Data Template With No Reporting Requirement—Issuer Level Tab

*All fields with an asterisk (*) are required. To validate the template, press Validate button or Ctrl + Shift + I. To finalize the template, press Finalize button or Ctrl + Shift + F.*

Centers for Medicare & Medicaid Services (CMS) Qualified Health Plan (QHP) Transparency in Coverage Reporting

Plan Year 2025 v5.0

Validate

Finalize

General Information	
Was this Issuer on the Exchange in 2023?*	No
SADP Only?*	No
Issuer HIOS ID*	11111
Issuer Level Data	
Number of Issuer Level In-Network Claims with Date(s) of Service (DOS) in 2023 That Were Also Received in Calendar Year 2023*	N/A
Number of Issuer Level In-Network Claims with DOS in 2023 That Were Also Denied in Calendar Year 2023*	N/A
Number of Issuer Level In-Network Claims with DOS in 2023 That Were Also Resubmitted in Calendar Year 2023*	N/A
Number of Issuer Level Out-of-Network Claims with DOS in 2023 That Were Also Received in Calendar Year 2023*	N/A
Number of Issuer Level Out-of-Network Claims with DOS in 2023 That Were Also Denied in Calendar Year 2023*	N/A
Number of Issuer Level Out-of-Network Claims with DOS in 2023 That Were Also Resubmitted in Calendar Year 2023*	N/A
Number of Issuer Level Internal Appeals Filed in Calendar Year 2023*	N/A
Number of Issuer Level Internal Appeals Overturned from Calendar Year 2023 Appeals*	N/A
Number of Issuer Level External Appeals Filed in Calendar Year 2023*	N/A
Number of Issuer Level External Appeals Overturned from Calendar Year 2023 Appeals*	N/A
Notes:	
Please enter any comments/notes here.	N/A

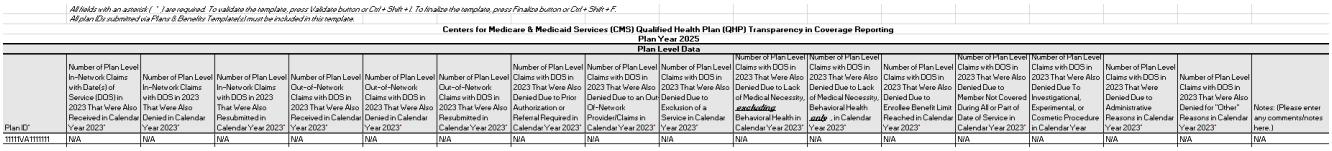
4.4.2 Issuers With No Reporting Requirement—Plan Level Data Tab

Plan Level Data	Expected Value
2025 On-Exchange Plan ID*	Enter the 14-character PY2025 plan ID on the *Plan Level Data* tab. The issuer must include all on-Exchange plan IDs present in its QHP Application (do not include plan IDs for off-Exchange–only plans) on the *Plan Level Data* tab.
Number of Plan Level In-Network Claims with DOS in 2023 That Were Also Received in Calendar Year 2023*	**N/A**
Number of Plan Level In-Network Claims with DOS in 2023 That Were Also Denied in Calendar Year 2023* (Plan Level Claims Denied)	**N/A**

Plan Level Data	Expected Value
Number of Plan Level In-Network Claims with DOS in 2023 That Were Also Resubmitted in Calendar Year 2023*	**N/A**
Number of Plan Level Out-of-Network Claims with DOS in 2023 That Were Also Received in Calendar Year 2023*	**N/A**
Number of Plan Level Out-of-Network Claims with DOS in 2023 That Were Also Denied in Calendar Year 2023 (Plan Level Claims Denied)*	**N/A**
Number of Plan Level Out-of-Network Claims with DOS in 2023 That Were Also Resubmitted in Calendar Year 2023*	**N/A**
Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Prior Authorization or Referral Required in Calendar Year 2023 (Plan Level Claims Denied)*	**N/A**
Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to an Out-of-Network Provider/Claims in Calendar Year 2023 (Plan Level Claims Denied)*	**N/A**
Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Exclusion of a Service in Calendar Year 2023 (Plan Level Claims Denied)*	**N/A**
Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Lack of Medical Necessity, Excluding Behavioral Health in Calendar Year 2023 (Plan Level Claims Denied)*	**N/A**
Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Lack of Medical Necessity, Behavioral Health only, in Calendar Year 2023 (Plan Level Claims Denied)*	**N/A**
Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Enrollee Benefit Limit Reached in Calendar Year 2023 (Plan Level Claims Denied)*	**N/A**
Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Member Not Covered During All or Part of Date of Service in Calendar Year 2023 (Plan Level Claims Denied)*	**N/A**
Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due To Investigational, Experimental, or Cosmetic Procedure in Calendar Year 2023 (Plan Level Claims Denied)*	**N/A**
Number of Plan Level Claims with DOS in 2023 That Were Also Denied for Administrative Reasons in Calendar Year 2023 (Plan Level Claims Denied)*	**N/A**

Plan Level Data	Expected Value
Number of Plan Level Claims with DOS in 2023 That Were Also Denied for "Other" Reasons in Calendar Year 2023 (Plan Level Claims Denied)*	**N/A**

Figure 2M-4. Sample Data Template With No Reporting Requirement—Plan Level Tab



*All fields with an asterisk (*) are required. To validate the template, press Validate button or Ctrl + Shift + I. To finalize the template, press Finalize button or Ctrl + Shift + F.*
All plan IDs submitted via Plans & Benefits Template(s) must be included in this template.

Centers for Medicare & Medicaid Services (CMS) Qualified Health Plan (QHP) Transparency in Coverage Reporting
Plan Year 2025
Plan Level Data

Plan ID*	Number of Plan Level In-Network Claims with Date(s) of Service (DOS) in 2023 That Were Also Received in Calendar Year 2023*	Number of Plan Level In-Network Claims with DOS in 2023 That Were Also Denied in Calendar Year 2023*	Number of Plan Level In-Network Claims with DOS in 2023 That Were Also Resubmitted in Calendar Year 2023*	Number of Plan Level Out-of-Network Claims with DOS in 2023 That Were Also Received in Calendar Year 2023*	Number of Plan Level Out-of-Network Claims with DOS in 2023 That Were Also Denied in Calendar Year 2023*	Number of Plan Level Out-of-Network Claims with DOS in 2023 That Were Also Resubmitted in Calendar Year 2023*	Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Prior Authorization or Referral Required in Calendar Year 2023*	Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to an Out-Of-Network Provider/Claims in Calendar Year 2023*	Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Exclusion of a Service in Calendar Year 2023*	Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Lack of Medical Necessity, *excluding* Behavioral Health *only* , in Calendar Year 2023*	Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Lack of Medical Necessity, Behavioral Health *only* , in Calendar Year 2023*	Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Enrollee Benefit Limit Reached in Calendar Year 2023*	Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due to Member Not Covered During All or Part of Date of Service in Calendar Year 2023*	Number of Plan Level Claims with DOS in 2023 That Were Also Denied Due To Investigational, Experimental, or Cosmetic Procedure in Calendar Year	Number of Plan Level Claims with DOS in 2023 That Were Denied Due to Administrative Reasons in Calendar Year 2023*	Number of Plan Level Claims with DOS in 2023 That Were Also Denied for "Other" Reasons in Calendar Year 2023*	Notes: (Please enter any comments/notes here.)
11111VA1111111	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

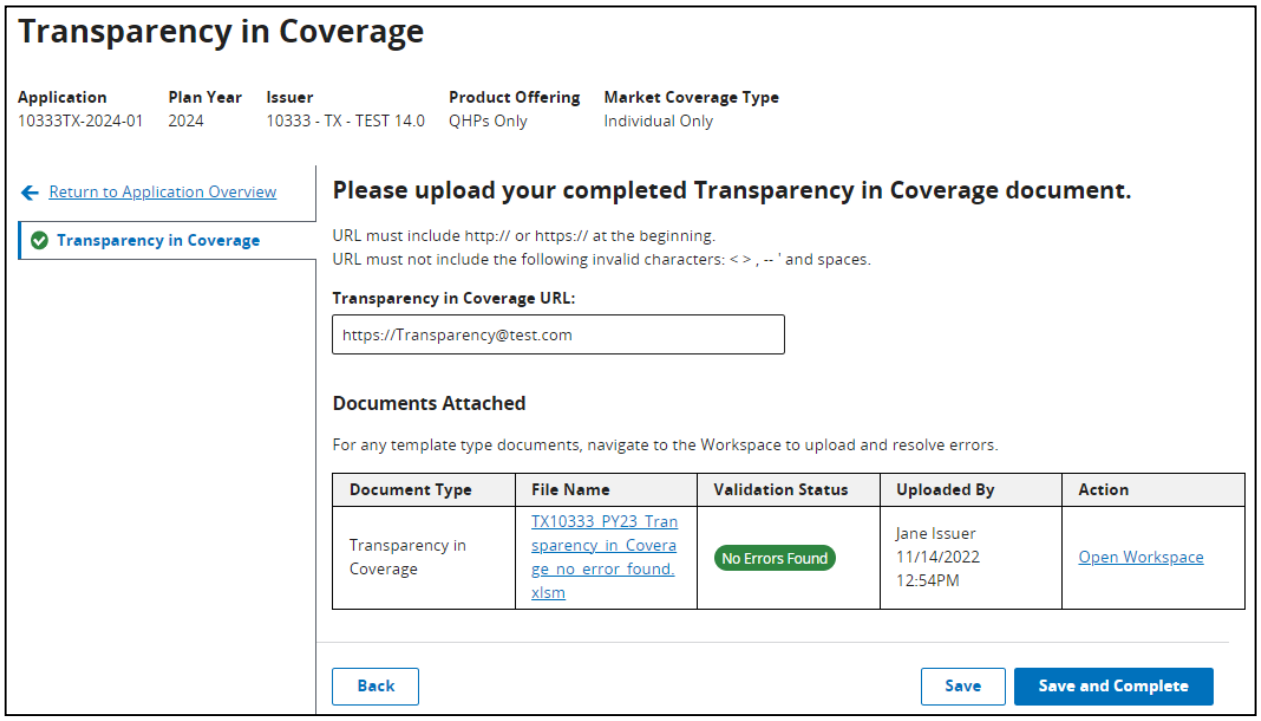
After you have entered all data, click **Save** to ensure no data are lost. Once the Transparency in Coverage Template is completed, it must be validated, finalized, and uploaded into the Marketplace Plan Management System (MPMS).

Template Validation and Submission Step	Step Description
Validate Template	Click **Validate** in the top left of the *Issuer Level Data* tab of the template. The validation process identifies any data issues that need to be resolved. If no errors are identified, finalize the template.
Validation Report	If the template has any errors, a Validation Report will appear in a pop-up box showing the reason for and cell location of each error. Correct any identified errors and click **Validate** again. Repeat until all errors are resolved.
Finalize Template	Click **Finalize** in the top left of the *Issuer Level Data* tab of the template to create the .XML file of the template that will need to be uploaded in the Plan Validation Workspace in MPMS. Issuers that submit via SERFF will upload their Transparency in Coverage Template in their SERFF binders.
Save Template	**Save** the .XML template. CMS recommends saving the validated template as a standard Excel .XLSM file in the same folder as the finalized .XML file for easier reference.
Upload and Link Template	Upload the saved .XML file in the Plan Validation Workspace in MPMS, link the validated template to the application and complete submission of your Transparency in Coverage URL. Issuers that submit via SERFF will submit the Transparency in Coverage Template in their SERFF binders and the Transparency in Coverage URL in MPMS. Refer to the MPMS User Guide for details on how to complete these steps.

5. Claims Payment Policy and Other Information URL

Issuers applying for PY2025 QHP certification, including issuers offering off-Exchange SADPs, must submit a Transparency in Coverage URL in MPMS (). Although SERFF issuers will submit their Transparency in Coverage Template in SERFF, the Transparency in Coverage URL must be submitted in MPMS.

Figure 2M-5. MPMS Submission Screen for Transparency in Coverage URL



Although a URL submission is required to apply for PY2025 QHP certification, issuers are required to submit an active URL that directs to a compliant claims payment policy website only if they offer on-Exchange QHPs and SADPs.

Issuer Type	Acceptable URL Submission
QHP issuer	Active URL directing to compliant claims payment policies
Other issuers (e.g., issuers with only off-Exchange SADP offerings)	http://temporary.url

The information below provides an overview of the information the issuer must include on the Transparency in Coverage URL's web page and examples of how it might be explained.

PY2025 URL Contents	Minimum Requirements
Claims Payment Policies & Other Information URL	Enter the active and easily accessible URL. Ensure it meets the following requirements: ◆ It can be viewed and accessed directly from the plan's public website via a clearly identifiable link or tab on the issuer's home or marketplace plan landing page without requiring an individual to create or access an account or enter a policy number ◆ An individual can easily discern which information applies to each plan the issuer offers. The URL is the web address on the issuer website that directs consumers to the page on the issuer's website they can use to view pertinent information about the issuer's practices. All URLs should be live and compliant when they are submitted, with one URL for a landing page or a single page with one or more links providing the information indicated below. If the issuer has unique HIOS Issuer IDs in the same state and the Transparency in Coverage information is the same across the HIOS Issuer IDs, the same URL may be submitted for all HIOS Issuer IDs. Note: If the URL or website content refers to the plan year, it should refer to the plan year of the current application submission, not the plan year of the claims data.

PY2025 URL Contents	Minimum Requirements
Out-of-network liability and balance billing	Description: ◆ Balance billing occurs when an out-of-network provider bills an enrollee for charges other than copayments, coinsurance, or the amount remaining on a deductible. Provide: ◆ Information regarding whether a consumer may have financial liability for out-of-network services. ◆ Any exceptions to out-of-network liability, such as for emergency services or pursuant to the No Surprises Act. ◆ Information regarding whether a consumer may be balance billed. Specific dollar amounts for out-of-network liability or balance billing do not need to be included. Example of Acceptable Consumer-Facing Language: Out-of-network services are from doctors, hospitals, and other health care professionals that have not contracted with your plan. A health care professional who is out of your plan network can set a higher cost for a service than professionals who are in your health plan network. Depending on the health care professional, the service could cost more or not be paid for at all by your plan. Charging this extra amount is called balance billing. In cases like these, you will be responsible for paying for what your plan does not cover. Balance billing may be waived for emergency services received at an out-of-network facility.
Enrollee claim submission	Description: ◆ An enrollee submits a claim instead of the provider, requesting payment for services received. Provide: ◆ General information on how an enrollee can submit a claim in lieu of a provider if the provider fails to submit the claim. If claims can only be submitted by a provider, indicate this here. ◆ A time limit to submit a claim, if applicable. If there is no time limit imposed for claim submission, specify that there is no time limit to submit a claim. If the issuer's time limits vary by state, list out the states and their corresponding time limits. ◆ Links to any applicable forms. All forms must be easily identifiable and publicly accessible. ◆ Describe how an enrollee can submit a claim if you do not require any forms. List any identifying information such as name, member number, and other information that an enrollee should include for successful claim submission. ◆ The physical mailing address or email address where an enrollee can submit a claim, and a customer service phone number. Example of Acceptable Consumer-Facing Language: A claim is a request to an insurance company for payment of health care services. Usually, providers file claims with us on your behalf. If you received services from an out-of-network provider, and if that provider does not submit a claim to us, you can file the claim directly. There are time limits on how long you have to submit claims, with details on the limit by state below. You can also check your specific plan's claims filing time limit information to determine the specific time limit for submitting your claim. Enrollee medical claim submission and claim filing time limit information: State (Maximum Claim Filing Time Limit) VT, NH, CT (90 Days) CA (90 Days) WA (180 Days) To file a claim, follow these steps: 1. Complete a claim form [Include link to Claim Form]. 2. Attach an itemized bill from the provider for the covered service. 3. Make a copy for your records. 4. Mail your claim to the address below. [Company Name] [P.O Box 1234]

PY2025 URL Contents	Minimum Requirements
	[City, State, ZIP Code] 5. Alternatively, you can send the information by email to [claims-submissions@companyname.com] or by fax to [123-456-7890].
Grace periods and claims pending	Description: ◆ QHP issuers must provide a grace period of 3 consecutive months if an enrollee receiving advance payments of the premium tax credit has previously paid at least 1 full month's premium during the benefit year. During the grace period, the issuer must provide an explanation of the 90-day grace period for enrollees with premium tax credits, pursuant to 45 CFR 156.270(d). Provide: ◆ An explanation of what a grace period is. ◆ An explanation of what claims pending is. ◆ An explanation that the issuer will pay all appropriate claims for services rendered to the enrollee during the first month of the grace period and may pend claims for services rendered to the enrollee in the second and third months of the grace period. Example of Acceptable Consumer-Facing Language: You are required to pay your premium by the scheduled due date. If you do not do so, your coverage could be canceled. For most individual health care plans, if you do not pay your premium on time, you will receive a 30-day grace period. A grace period is a time period when your plan will not terminate even though you did not pay your premium. Any claims submitted for you during that grace period will be pended. When a claim is pended, that means no payment will be made to the provider until your delinquent premium is paid in full. If you do not pay your delinquent premium by the end of the 30-day grace period, your coverage will be terminated. If you pay your full outstanding premium before the end of the grace period, we will pay all claims for covered services you received during the grace period that are submitted properly. If you have an individual HMO plan in [state], we will pay your claims during the 30-day grace period; however, your benefits will terminate if your delinquent premium is not paid by the end of that grace period. If you are enrolled in an individual health care plan offered on the *Health Insurance Marketplace* and you receive an advance premium tax credit, you will get a 3-month grace period and we will pay all claims for covered services that are submitted properly during the first month of the grace period. During the second and third months of that grace period, any claims you incur will be pended. If you pay your full outstanding premium before the end of the 3-month grace period, we will pay all claims for covered services that are submitted properly for the second and third months of the grace period. If you do not pay all of your outstanding premium by the end of the 3-month grace period, your coverage will terminate, and we will not pay for any pended claims submitted for you during the second and third months of the grace period. Your provider may balance bill you for those services.
Retroactive denials	Description: ◆ A retroactive denial reverses a previously paid claim, making the enrollee responsible for payment. Provide: ◆ An explanation that claims may be denied retroactively, even after the enrollee has obtained services from the provider, if applicable. ◆ Ways to prevent retroactive denials when possible, such as paying premiums on time. Example of Acceptable Consumer-Facing Language: A retroactive denial is the reversal of a claim we have already paid. If we retroactively deny a claim we have already paid for you, you will be responsible for payment. Some reasons why you might have a retroactive denial include having a claim that was paid during the second or third month of a grace period or having a claim paid for a service for which you were not eligible. You can avoid retroactive denials by paying your premiums on time and in full and making sure you talk to your provider about whether the service performed is a covered benefit.

PY2025 URL Contents	Minimum Requirements
	You can also avoid retroactive denials by obtaining your medical services from an in-network provider.
Recoupment of overpayments	Description: ◆ If the issuer overbills an enrollee for a premium, the enrollee may use recoupment of overpayments to obtain a refund. Provide: ◆ Instructions on how enrollees can obtain a refund of premium overpayment, including a phone number or email address they should contact. Example of Acceptable Consumer-Facing Language: If you believe you have paid too much for your premium and should receive a refund, please call the member service number on the back of your ID card.
Medical necessity and prior authorization timeframes and enrollee responsibilities	Description: ◆ Medical necessity is used to describe care that is reasonable, necessary, and appropriate, based on evidence-based clinical standards of care. ◆ Prior authorization is a process by which an issuer approves a request to access a covered benefit before the enrollee accesses the benefit. Provide: ◆ An explanation that some services may require prior authorization and may be subject to review for medical necessity. ◆ Any ramifications should the enrollee not follow proper prior authorization procedures. ◆ A timeframe for the issuer to provide a response to the enrollee or provider's prior authorization request, including urgent requests as applicable. Example of Acceptable Consumer-Facing Language: We must approve some services before you obtain them. This is called prior authorization or preservice review. For example, any kind of inpatient hospital care (except maternity care) requires prior authorization. If you need a service that we must first approve, your in-network doctor will call us for the authorization. If you don't get prior authorization, you may have to pay up to the full amount of the charges. The number to call for prior authorization is included on the ID card you receive after you enroll. Please refer to the specific coverage information you receive after you enroll. We typically decide on requests for prior authorization for medical services within 72 hours of receiving an urgent request or within 15 days for non-urgent requests.
Drug exception timeframes and enrollee responsibilities (not required for SADPs)	Description: ◆ Issuers' exceptions processes allow enrollees to request and gain access to drugs not listed on the plan's formulary, pursuant to 45 CFR 156.122(c). Provide: ◆ An explanation of the internal exceptions process for people to obtain non-formulary drugs. ◆ An explanation of the external exceptions process for people to obtain non-formulary drugs through external review by an impartial, third-party reviewer, or independent review organization (IRO). ◆ Timeframes for decisions based on standard reviews and expedited reviews due to exigent circumstances. ◆ Instructions on how to submit required information to start the exceptions process. This includes a request form link, address, phone number, or fax number for the enrollee to contact. Example of Acceptable Consumer-Facing Language: Sometimes our members need access to drugs that are not listed on the plan's formulary (drug list). These medications are initially reviewed by [plan name] through the formulary exception review process. The member or provider can submit the request to us by faxing the Pharmacy Formulary Exception Request form [link provided here]. If the drug is denied, you have the right to an external review.

PY2025 URL Contents	Minimum Requirements
	If you feel we have denied the non-formulary request incorrectly, you may ask us to submit the case for an external review by an impartial, third-party reviewer known as an independent review organization (IRO). We must follow the IRO's decision. An IRO review may be requested by a member, member's representative, or prescribing provider by mailing, calling, or faxing the request: [Request Form Link] [Address] [Phone] [Fax]. For initial standard exception review of medical requests, the timeframe for review is 72 hours from when we receive the request. For initial expedited exception review of medical requests, the timeframe for review is 24 hours from when we receive the request. For external review of standard exception requests that were initially denied, the timeframe for review is 72 hours from when we receive the request. For external review of expedited exception requests that were initially denied, the timeframe for review is 24 hours from when we receive the request. To request an expedited review for exigent circumstance, select the "Request for Expedited Review" option in the Request Form.
Explanation of benefits (EOB)	Description: ◆ An EOB is a statement the issuer sends an enrollee that lists the medical treatments or services the issuer paid for on an enrollee's behalf, what the issuer paid, and the enrollee's financial responsibility pursuant to the terms of the policy. Provide: ◆ An explanation of what an EOB is. ◆ Information regarding when an issuer sends EOBs (e.g., after it receives and adjudicates a claim or claims). ◆ How a consumer should read and understand the EOB. Example of Acceptable Consumer-Facing Language: Each time we process a claim submitted by you or your health care provider, we explain how we processed it on an Explanation of Benefits (EOB) form. The EOB is not a bill. It explains how your benefits were applied to that particular claim. It includes the date you received the service, the amount billed, the amount covered, the amount we paid, and any balance you're responsible for paying the provider. Each time you receive an EOB, review it closely and compare it to the receipt or statement from the provider.
Coordination of benefits (COB)	Description: ◆ COB allows an enrollee who is covered by more than one plan to determine which plan pays first. Provide: ◆ An explanation of what COB means (i.e., that other benefits can be coordinated with the current plan to establish payment of services). Example of Acceptable Consumer-Facing Language: Coordination of benefits (COB) is required when you are covered under one or more additional group or individual plans, such as one sponsored by your spouse's employer. An important part of coordinating benefits is determining the order in which the plans provide benefits. One plan provides benefits first. This is called the primary plan. The primary plan provides its full benefits as if there were no other plans involved. The other plans then become secondary. Further information about COB can be found in your benefit booklet.

Once the Transparency in Coverage URL is entered, click the "Save" button to ensure no data are lost.

This concludes the Transparency in Coverage section of the QHP Application Instructions.