System Validations for the 2018 MLR Reporting Year

When an issuer uploads the annual MLR reporting form into the Health Insurance Oversight System (HIOS), the submission undergoes several automated validations. Some of the validations result in an error message and the issuer must resolve the problem before they can attest to their submission. Other validations result in warning messages to indicate a potential problem with their submission but do not prevent the company from attesting to their submission.

In addition to receiving validation messages by email, company users may view the full list of validation messages using the "Warnings and Comparison Report" on the "View Data" page or the "Attestation" page in HIOS. Each validation message indicates the name of the template that triggered the validation, as well as the relevant row and column within the template. Some of the validations apply to the entire submission, including all State workbooks and the Grand Total (GT) workbook. Others apply only to State workbook or only to the GT workbook.

Error Messages

Validation	Template	Trigger	Message
Unofficial Template	State GT	Submission contains templates that were not generated by HIOS for the particular company, state, and reporting year. *(Issuers may only upload official templates downloaded from HIOS.)*	"The MLR Annual Form is not of the correct version. Please download the updated MLR Annual Form from the 'Download Templates' section." "Cannot accept [Workbook Name]. Please complete a workbook for [State] and resubmit your .ZIP file."
Extra Template	State GT	Submission contains templates for one or more states that were not contained in the download. *(Users may only upload templates for the company's associated states.)*	"The uploaded MLR Annual Form for this state is not associated with the selected Company."
Missing Template	State GT	Submission is missing templates for one or more states that were contained in the download. *(All templates downloaded from HIOS must be completed and uploaded.)*	"Please complete a workbook for [State] and resubmit your .ZIP file."
Duplicate Templates	State GT	Submission contains duplicate templates. *(Users may only upload one template per state for the company.)*	"[File Name]: Cannot accept duplicate files."
Incorrect Template	State GT	Submission contains incorrect version of MLR templates	"The MLR template is not of the correct version. Please download the updated template from the "Download Templates" section.
Incorrect Zipping Method	State GT	Submission contains MLR templates that were not zipped correctly.	"Zip files must be created through the selection of the individual Excel files. Any other method of zipping up files will not be permitted for upload by the system."

Validation	Template	Trigger	Message
Invalid Data Type	State GT	Invalid data type (e.g., character values in numeric field, out of bounds numeric entry, etc.)	e.g. "Should contain only a numeric value up to ten trillion and at most 15 decimals."
Data in Grey Cells	State GT	Data entered into cells not designated for user entry (grey cells).	"Should not contain user input."

Warning Messages

Validation	Template	Trigger	Message
Blank Tabs	State GT	Parts 1, 2, 3, or 4 of the reporting form are blank (*state templates*) or Part 1, 2, 4 is blank (*GT template*).	e.g. "Pt 1 Summary of Data worksheet is required."
Negative Member Months	State GT	Part 1 Line 7.4 *(member months)* is negative.	"A non-negative number is expected."
Member Months Inconsistent with Premium or Claims	State GT	Part 1 Line 1.1 *(total direct premium earned)* > 0 OR Part 1 Line 2.1 *(total incurred claims)* > 0 **AND** Part 1 Line 7.4 *(member months)* ≤ 0 or is Blank. -OR- Part 1 Line 1.1 *(total direct premium earned)* ≤ 0 or blank OR Part 1 Line 2.1 *(total incurred claims)* ≤ 0 or is Blank **AND** Part 1 Line 7.4 *(member months)* > 0.	"Values reported in Part 1, Line 1.1; Part 1, Line 2.1; and/or Part 1, Line 7.4 suggest an inconsistency."
Unusual Premium per Life Year	State GT	Part 2 Line 1.1 *(direct premium written)* / (Part 1 Line 7.4 *(member months)* / 12) is < $120 or > $12,000. *(Health insurance coverage columns only.)*	"Values reported in Part 2, Line 1.1 and Part 1, Line 7.4 suggest an inconsistency."
Sum of States ≠ GT Values	GT	Sum of values reported on all state templates ≠ value reported on GT template. *(Health insurance coverage and mini-med columns only; Parts 1 and 2, and Part 4 Sections 1, 2, 3, 4a, 4g only.)*	"The sum of values reported for each state should balance to the GT."
Small Closed Blocks of Business	STATE GT	The company identified as a "small closed block of business" in HIOS and Part 3 Line 3.1 Column CY is blank.	"[Workbook Name] [Part] [Line of Coverage] [Market] [Row and Column Description] [Excel cell reference]: Part 3, Line 3.1 is required for small closed blocks of business."

Validation	Template	Trigger	Message
Small Closed Blocks of Business	STATE GT	The company identified as a "small closed block of business" in HIOS and Part 3 Line 3.1 Column Total is >= 1,000.	"[Workbook Name] [Part] [Line of Coverage] [Market] [Row and Column Description] [Excel cell reference]: Issuers with 1,000 or more life-years nationwide (combined for all health insurance coverage business subject to MLR) for the MLR reporting year do not meet the criteria for small closed blocks of business. Please complete the full reporting form."
Incorrect MLR Calculation	State GT	Part 3 Line 4.3 *(credibility-adjusted MLR)* > HIOS-calculated value **AND** Part 3 Line 3.1 Column Total *(life-years)* ≥ 1,000.	"MLR DISCREPANCY: The [user entered value] value reported by user does not match the system calculated value of [system calculated value]."
Incorrect Rebate Amount	State GT	Part 3 Line 5.4 *(rebate amount)* < HIOS-calculated value **AND** Part 3 Line 3.1 Column Total *(life-years)* ≥ 1,000.	"REBATE DISCREPANCY: The [user entered value] value reported by user does not match the system calculated value of [system calculated value]."
Incorrect Limited Payable Rebate Amount	State GT	Part 3 Line 5.8 *(rebate amount)* < HIOS-calculated value **AND** Part 3 Line 3.1 Column Total *(life-years)* ≥ 1,000 **AND** Part 3 Line 5.5 (*single-year rebate liability*) is populated in at least one column (PY2, PY1, CY).	"LIMITED PAYABLE REBATE DISCREPANCY: The [user entered value] value reported by user does not match the system calculated value of [system calculated value]."
Blank State Premium Tax Rate	State	Part 5 Line 1 *(state premium tax rate used to determine allowable CBE)* is Blank **AND** Part 1 Line 3.2c *(community benefit expenditures deductible from premium in MLR calculations)* ≠ 0 or is not Blank.	"Values reported in Part 1 Line 3.2c require the completion of Part 5 Line 1 of your filing."
Blank Expense Allocation Descriptions	GT	Part 6 *(expense allocation)* is Blank **AND** Part 1 Sections 3, 4, 5 or Part 2 Section 2 ≠ 0 or are not Blank.	"Values reported in Part 1 Sections 3, 4, & 5 and Part 2 Section 2 require the completion of Part 6 of your filing. (Not necessary on a state by state basis.)"

Validation	Template	Trigger	Message
Blank Rebate Disbursement Descriptions	State GT	Part 4 Line 4.g *(amount of unclaimed rebates from prior MLR reporting years)* > 0 **AND** Part 4 Line 4.h *(methods used to locate policyholders/ subscribers for prior MLR reporting year's unclaimed rebates)* is blank or Line 4.i *(disbursement of prior MLR reporting year's unclaimed rebates)* is Blank.	"Part 4 Rebate Disbursement Lines 4h and 4i are required."
Blank Affiliate Names	State	Part 5 Section 2 *(Affiliate(s) name(s) with whom blended rate adjustments were made)* is Blank **AND** Part 2 Line 2.15 *(blended rate adjustment)* is not Blank. **-OR-** Part 5 Section 3 *(Affiliate(s) name(s) with whom dual contract experience is being reported)* is Blank **AND** Parts 1 & 2 Columns 3, 8, 13, 18, 21, 24, 37 *(dual contract)* are not Blank.	"Values reported in Part 2 Line 2.15 require the completion of Part 5 Line 2 of your filing." **-OR-** "Values reported in the Dual Contract 3/31 Columns require the completion of Part 5 Line 3 of your filing."