Issuer Module 1: Rate Review Reporting Procedures and Data Collection System (HIOS) Instructions Webinar

Transcript

Slide 1 (Title Slide):

Hello, I'm Sally McCarty, Director of Rate Review at the Center for Consumer Information and Insurance Oversight, or CCIIO.

CCIIO operates within the Centers for Medicare and Medicaid Services, which is commonly referred to as "CMS."

I want to welcome you to training for the CMS Rate Review Program.

We are pleased to partner with issuers to provide vigorous rate review and greater transparency of rate development to health insurance consumers.

Slide 2:

The rate review health insurance issuer training consists of three modules. This is the first training module. It provides an overview of the issuer rate review reporting and disclosure requirements and includes instructions for using the Health Insurance Oversight System – which we will refer to as "HIOS."

Additional training modules are available to registered issuer training participants. These modules provide technical instructions for completing the Preliminary Justification and for calculation the "Subject to Review" rate increase test.

Training participants can find detailed rate review program guidance on all of the topics covered in this training on the CMS/CCIIO website.

All issuer training participants should download the issuer rate review instruction manual and the rate review HIOS instruction manual, available on the CCIIO website, prior to taking this training.

Slide 3:

The CMS Rate Review Program was created under section 2794 of the Public Health Service Act, as amended by section 1003 of the Patient Protection and Affordable Care Act. CCIIO is responsible for implementing this new program.

On May 23, 2011, CCIIO published the "Rate Increase Disclosure and Review" Final Rule, which establishes the requirements of the Rate Review Program. The program will being operation on September 1, 2011.

Now, Dan Miller, the chief architect of the rate review program, will begin our training.

Slide 4:

Thanks Sally, I'm going to begin the training with an overview of the rate review program.

1. Health insurance issuers must report rate increases to CMS that are at or above the 'subject to review' threshold. This threshold is set at 10% for the first year of the rate review program. In 2012 CCIIO will establish state specific review thresholds.

2. Issuers must submit a preliminary justification—the primary rate review reporting requirement—for each rate increase that is at or above the 'subject to review' threshold. Issuers must submit the preliminary justification to CMS via HIOS, regardless of whether the review is assigned to the State or CMS.

3. All rate increases at or above the 'subject to review' threshold will be reviewed by States or CMS, depending on whether a State has been determined to have an effective rate review program. For each 'subject to review rate increase', the State or CMS reviewer will make a determination on whether the increase is unreasonable.

4. If a rate increase is determined to be unreasonable, issuers must provide a Final Justification, if they intend to implement the rate increase.

5. CMS will post the Preliminary Justification and information about the rate review determination on healthcare.gov. Consumers will be able to access the preliminary justification information shortly after it is submitted to CMS. The website will track the status of each review, for example new records will be labeled on the website as having a pending review status. When the reviews are complete the review status will be updated to include information on the review determination.

Slide 5

The Rate Review Regulation applies to health insurance issuers offering coverage in the individual and small group markets. These requirements do not apply to grandfathered health plans or to excepted benefits.

Slide 6

The Preliminary Justification consists of three parts:

- **Part I, the Rate Increase Summary Form**: is a standardized Excel-based form that collects high-level data on the underlying medical and administrative cost drivers of the rate increase.

- **Part II, the Written Explanation of the Rate Increase**: is a brief, non-technical consumer-oriented explanation of the rate increase, intended to provide context for the quantitative data provided in Part I.

- **Part III, Rate Filing Documentation**: this section of the Preliminary Justification is only collected when CMS is conducting the rate review. Issuers must provide detailed rate information that will be used by CMS to conduct actuarial reviews.

  The technical instructions for completing the preliminary justification are provided in the Issuer Rate Review manual available on the CCIIO website. Additionally, the second issuer rate review training module provides detailed technical information for completing the preliminary justification.

Slide 7

The timing of preliminary justification submission requirements is based on State rate filing requirements.

For States with Rate Filing Requirements: Issuers must submit the Preliminary Justification on the same date that the rate filing is submitted to the state. Thus, issuers must provide a Preliminary Justification for any rate increases at or above the subject to review threshold that are filed on or after September 1, 2011.

For States without Rate Filing Requirements: Issuers must submit the Preliminary Justification prior to implementing the rate increase. Issuers must provide a Preliminary Justification for any rate increase above the subject to review threshold that go into effect on or after September 1, 2011.

As part of the preliminary justification submission process issuers must complete a submission and attestation step. Only attested records are web-posted. Review determinations will be made for all attested records. The HIOS system provides clearly labels the attestation status of each record.

For CMS reviews, issuers are encouraged to submit their preliminary justifications to CMS 60 days in advance of the effective date to provide CMS with sufficient time to review the rate and make a determination prior to the effective date.

The regulation requires issuers to submit the preliminary justification to CMS and States. As all States have access to the preliminary justification data in HIOS, this requirement will be satisfied by a single preliminary justification submission in HIOS.

Slide 8

All issuers will use the new Rate Review Module HIOS to submit rate review information to CMS. This is the same data collection system that issuers currently use for submitting healthcare.gov plan finder data to CMS.

On July 22, CMS sent emails to issuers with registration information for accessing the new Rate Review module in HIOS. Both existing and new HIOS users must register for access to the Rate Review system.

In additional to taking this training, State HIOS users are strongly encouraged to review the Technical Rate Review System manual available on the CMS CCIIO website. This manual provides step-by-step instructions for all issuer user functions included in the HIOS Rate Review system.

Slide 9

All approved HIOS users will receive an email with login information and the HIOS URL. The main HIOS URL will direct users to the Sign in screen.

Slide 10

After logging into the system users will be directed to the HIOS home page. This page may look different for each HIOS user, depending on the user's HIOS access rights. [[In this screenshot, the user has access to the plan finder and rate review modules.

After selecting "Rate Review" from the HIOS main page, users will be directed to the Rate Review System Home Page.

Slide 11

The Rate Review system home page contains three tabs: the Rate Review Submissions tab, Review Rate Data tab, and the Submission Status Reports tab

If you click on the "Rate Review Submissions" tab, additional links will appear on the screen.

Slide 12

The links that are displayed on this page may vary slightly on a particular users access rights.

The first link on this page allows users to download Part I of the Preliminary Justification, the Rate Increase Summary Form.

The Second allows users to upload a preliminary justification submission in HIOS.

The Upload Supplemental Materials, Upload Modification Materials, and Enter Unreasonable Rate Increase Justification links allow issuers to append existing HIOS records with additional information.

I will provide more information on the links on the rate review main menu page later in the training. I am now going to explain how issuers should submit a new preliminary justification submission in HIOS. To submit a new Preliminary Justification click on the 'Upload Preliminary Justification'link.

Slide 13

This is the screen you will see after you click on 'this link.

The rate review module in HIOS is populated with all of the issuer and product information that issuers have already submitted into HIOS through the plan finder reporting requirements. Issuers may only submit a preliminary justification for a product that is already registered in HIOS.

On the first preliminary justification upload page, issuers must specify a state-level HIOS issuer ID. The issuers ID options will be limited to an individual users access rights and in most cases will be limited to only one issuer ID.

After an issuer ID is selected, HIOS will automatically populate the product field with a list of all of the products for the selected issuer ID. The HIOS ID and product name will be provided for each product option. Issuers should use the 'add products' button to select the products that are included in the preliminary justification submission.

Next users must enter the effective date of the rate increase.

For the policy form ID field issuers must enter the state policy form IDs. Note that the product field uses HIOS product IDs and product names. In the policy field issuers must enter the policy IDs that are on file with the state.

For Filing tracking number issuers should enter the SERFF filing number or state filing number if no SERFF filing number exists. Issuers may only leave this field blank in cases where no filing number exists for a particular rate increase (for example in states that do not have filing requirements).

After all of the fields on this page have been completed users should click on 'continue'. If there were any errors in the submitted information- for example if a required field was left blank- the system will generate an error message on the top of this page. If there are no errors on this page, the user will be directed to the second upload page.

Slide 14

The top of the second upload screen summarizes all of the information entered by the user on the previous screen. If this information is incorrect users may return to the previous screen.

The HIOS system has been programmed to appropriately identify whether a particular submission will be assigned to a State or CMS for review. This information is provided in the text below the green box. Note that the display of this screen will vary depending on whether CMS or the State is conducting the review. Specifically, the upload box for Part III of the preliminary justification will only be on this screen in cases where CMS is conducting the rate review.

Under the heading Part 1, Upload Part 1 of the preliminary justification, issuers should use the upload box to browse and upload their Part I submission. Issuers must use the Part I template that is available in HIOS for completing Part I of the preliminary justification.

The excel file completed by an issuer must be saved as an Excel 2003 file or in other words as an .xls file. Issuers may use Excel 2007 or 2010 to complete the preliminary justification. However the file must be saved as an Excel 2003 file. When Excel 2007 or 2010 is used to complete the preliminary justification and issuers save down to 2003, they will see a 'loss of fidelity' warning message in Excel. Issuers should disregard this message as saving down to 2003 will have no impact on the integrity of the file. Note, users will receive a submission failure email stating that there submission was not successfully uploaded if the Part I file is not an Excel 2003 file or if the issuer did use the Part I file available for download on HIOS.

Slide 15

Under the heading Part 2, Upload Part II of the Preliminary Justification, issuers must use the text box to enter their Part II submission.

Lastly, under Part 3, Upload Part III of the preliminary justification, issuers must use the upload boxes to browse and upload their Part III submissions Again part 3 upload section of this screen will only appear in cases where HHS is conducting the review.

Issuers must upload an 'hhs only' and a public version of Part III. Note that HIOS uses the terms CMS and HHS interchangeably. Issuers must upload a public and HHS only version of part III even in cases where there are no differences between the public and hhs only version of the file.

The HHS version must contain all of the data elements described in the Issuer Rate Review Manual. Additionally, the CMS version must clearly identify the information that the Issuer asserts should be protected based on the trade secret and confidential commercial standards set forth in CMS' FOIA regulation. The Issuer may redact protected information from the public version of Part III. However, the Issuer must supply a public version that displays redacted or "blacked out" text (i.e., redactions must be clearly documented in the public version).

Note that HIOS allows issuers to submit multiple files for part III. For example, you may want to submit various technical exhibits as separate files. To submit more than one file for part III, click on the Add button.

Unlike Part I of the preliminary justification, part III is not stored as data in the HIOS database. This means that Part III does not have the same upload restrictions as Part I. Issuers may upload any type of Word, Excel, or PDF file.

After users have completed all of the submission steps on this page, they should click on 'upload'. Alternatively, issuers may select reset to wipe out all of the information that has been entered on this page.

After users have uploaded the preliminary justification, the system will display the following screen.

Slide 16

This screen summarizes the information contained in the preliminary justification submission. No information is provided on this screen regarding whether the record has been successfully uploaded into HIOS. HIOS submitters will receive an email notification stating whether a submission has been successfully submitted into HIOS. Following issuer submission, HIOS runs an automated data validation check on Part I. The system checks to make sure that the issuer used the right version of the excel template and it saved it as a 2003 file. Additionally the system runs a check on each required field in part I to make sure that it has been entered with a permissible value.

If a submission fails the data validation check, the record will not be stored in HIOS. Issuers will be required to fix errors and resubmit a new record in HIOS. Note when a submission is rejected, the submitter will receive an email that lists the specific fields that must be fixed in Part I.

Slide 17

This slide shows an example of the email that would be sent for a successful submission.

Slide 18

Issuer HIOS users will be required to access submitted preliminary justification records in order to perform several post-submission follow up actions, including record attestation.

The best way to access and view successfully submitted records in the HIOS system is through the submission status report. This feature can be accessed from the rate review main menu page. Click on the tab labeled 'Submission status report'. After this tab is selected users will be directed to the Submission status report screen.

Slide 19

On the submission status report page, users may retrieve all their records in the system by simply clicking on ‘search’. Alternatively, issuers can use the search features to restrict their search results.

The search options on this page include:

- The Submission type: this allows users to restrict search results to records assigned to CMS or States.
- The Issuer/State search field: allows users to limit their search results to specific a issuer
- The Effective date search field allows users to restrict their search results to a particular rate increase effective date.
- The Submission ID field allows users to restrict their results to specific HIOS record IDs.
- The Status search field allows users to restrict search results based on the status of the review. For example users can restrict results to only rate increases that are pending review determinations.
- Lastly users can restrict search results based on the dates when records were either initially submitted or attested by issuers in the HIOS system.

Here is an example of what you might see if you clicked on ‘search’ without filling in any of the search fields.

Slide 20

Here is an example of what you might see if you clicked on search without setting any search restrictions. Note users may only retrieve records for their company.

The submission status report search results are presented in a record table format. Each row in the table provides key descriptive information, including:

- The HIOS Submission ID
- The Issuer name and state
- The time and date stamps for the HIOS submission and attestation
- The review status
- The number of days the record has been in its current status, and
- The number of days that have passed since Attestation
- The Submission type: whether the review determination will be entered into HIOS by CMS or the State.

Slide 21

In general all HIOS status labels fall into three categories: pre-attestation phase, review phase, and determination phase.

Pre attestation phase labels are assigned to the record, before an issuer completes the attestation step. These records will labeled in HIOS as ‘pre-attestation’ or pre-attestation (deleted) depending on whether an issuer has deleted the record prior to attestation.

Following attestation, the status will automatically be updated to ‘record attested’. CMS or state users may change this status to ‘review in progress’ at their discretion while the record is in the review phase.

Lastly the status labels are updated again during the determination phase. CMS and States will assign a rate review determination status to each record that they review at the close of the review process. Determination statuses include, unreasonable, not unreasonable, as well as other options that will be discussed later in the training.

Issuers should consult the technical system manual for a complete listing of all of the HIOS status labels.

Slide 22

Issuers should use the status labels provided in this report to identify records that require additional follow up in HIOS. I am now going to talk about how a user may review a submitted record and I will also cover some of the HIOS functions that issuers will use after they have submitted a preliminary justification record. On the submission status report page. You can access a submitted record by clicking on 'select'. This will take you to the review rate data page for the record.

Slide 23

The top of the review rate data page provides ID information for the record. Issuers can use the scroll bar fields at the top of the page to locate another record, but in most cases it will be easier to just return to the submission status report.

Under the heading labeled 'Record Materials', Issuer users can view or download all of the information associated with a preliminary justification submission.

For example, issuers can download their part I submissions by clicking on the link next to 'rate summary form' Part II is displayed in the textbox shown on this screen.

Slide 24

This slide shows the bottom half of the review rate data screen. Issuer can use the links on this screen to download and review their Part III submissions.

In addition to being able to download the Part I excel file, users can view an html presentation of the Part 1 by clicking on 'view submission data'.

Slides 25 and 26

These screen shows the HIOS presentation of the Part I data.

Slide 27

After records have been submitted to the system, issuers must attest to the accuracy of the submission. Only users with attestation rights will be allowed to complete this step in HIOS. Issuers should use the submission status report to locate records that require attestation. After records are initially submitted they will be labeled in HIOS as having a 'pre-attestation status'. Attestation of rate review records will trigger web-posting by CMS of the preliminary justification information. It will also enable the review functions in HIOS which will allow state and CMS users to assign a rate review determination to the record.

When a record is in the pre-attestation phase, issuers may attest to the record from the review rate page. The attestation function is at the bottom of the review rate data screen.

Slide 28

Note that the system also allows issuers to delete the record from the rate review system prior to attestation. This is the only point in the rate review process where issuers can delete a record and prevent the record from being posted on healthcare.gov (the delete button is disabled following attestation).

After attesting to the record, the record will be posted on healthcare.gov regardless of any subsequent actions taken by the issuer in HIOS. Thus it is critical that issuers review their submission prior to attestation.

Any errors identified by issuers after attestation must be communicated to CMS outside of the HIOS system. CMS will make determinations on the disposition of the information already posted on the website for these records on a case-by-case basis.

To attest to a record, issuers must check the attestation box and click save. To delete the record, issuers must click on the delete button. The status of the record will be updated to either 'record attested' or pre-attestation (deleted).

Slide 29

This slide shows the status that will be displayed in HIOS for an attested record.

Slide 30

For CMS reviews, CMS will rely on the information provided in Part III of the preliminary justification, the rate filing documentation to conduct its review and make a rate increase determination. If CMS is unable to make its determination based on the information provided in part III, CMS may request additional supplemental information from an issuer.

Slide 31

When CMS requests supplemental information registered HIOS users will be sent an email notification. The email will provide record ID information as well as a description of the information that issuer must provide.

Issuers will have 10 business days to respond to supplemental requests in HIOS. Failure to respond to a supplemental request may result in an unreasonable rate increase determination due to failure to provide sufficient justification for the rate increase.

Slide 32

When CMS requests supplemental information, the status of the record in HIOS will change to 'pending supplemental information'.

Slide 33

Issuers can submit supplemental information, by locating the appropriate record in the submission status report and opening the review rate data screen.

On the review rate data page, click on the link towards the bottom of the page labeled upload supplemental materials. This will open the Upload Supplemental materials page. (This link is only enabled when the record is in the 'pending supplemental material'status.

Slide 34

On the Upload supplemental materials page, users can view the description of the information that must be provided to CMS

Under this description is an upload box. Issuers should use this upload box to browse and upload files. More than one file may be uploaded by using the add button. Users may submit Word, PDF, Excel files. After you have located the appropriate files using the upload box. Click 'upload' to submit the supplemental information in HIOS.

Slide 35

A confirmation message will appear on the top of the screen indicating that the information has been submitted to HIOS. If no files are uploaded and 'upload' is clicked an error message will appear on this screen.

Slide 36

CMS will use the supplemental request feature in HIOS to request information from issuers while a rate review is in progress. In addition to the supplemental request feature in HIOS, issuers will also be able to provide CMS with information on changes or modifications to a rate increase while a review is in progress using the modification feature in HIOS.

Issuers must use the modification feature to 1) explain changes to the rate increase (or changes in the supporting data or assumptions associated with the rate increase) that would have a material impact on CMS' review of the increase.

Issuers only need to use this feature for CMS reviews, as issuers are expected to communicate this type of information using their existing lines of communication with states.

Slide 37

After a rate increase is attested in HIOS the delete button on the review rate data page is replaced with the 'Modify Submission' button.

Clicking on the 'Modify Submission' button will open the Upload Modification materials page.

Slide 38

On the upload modification materials page, issuers must fill in the text box under the heading 'explanation of modification' with a description of the modification to the rate increase. If the modification includes a change to the rate increase amount, this must be described in this text box.

Additionally, issuers have the option to upload files on this page. Issuers may upload any documentation or exhibits related to the modification that CMS should consider as part of its ongoing review. For example if the issuer has changed its trend assumptions, the issuer may want to revise the trend information that was previously provided under Part III of the preliminary justification.

Note, that issuers are only required to submit and attest to one preliminary justification for each rate increase, even if the rate increase is modified after the original preliminary justification submission. The Preliminary Justification originally submitted for a rate increase will not be replaced on the website with an updated version when issuers modify a rate increase that is under review. When CMS completes its rate review, the web-posted review determination will describe any applicable modification to the rate increase that occurred after the submission of the preliminary justification.

If an issuer intends to entirely retract a rate increase as opposed to modify it, the issuer should use the text box in the modification feature to indicate that they are withdrawing rate increase. In these cases CMS will set the rate review determination to 'Withdrawn prior to Determination' in HIOS.

After a user has filled in the text box and uploaded one or more files. The user should click 'save' to submit the rate increase modification in HIOS.

After clicking save the status of the record will be set to' modified'. Issuers will be able to view their modified submissions on the review rate page by clicking on the link labeled 'view modification materials'.

Slide 39

This slide shows the 'view modification submission' link on the review rate page. The link is only enabled when an issuer has made a modification submission.

Slide 40

At the close of each rate review States or CMS will enter a review determination in HIOS. States are required to enter these determinations into HIOS within 5 business days of the close of their review. In general, CMS will enter its review determination within 60 days of attestation. The following determinations will be assigned to each attested record.

1. **Unreasonable Rate Increase:** the rate increase was determined to be unreasonable based on a review by a State or CMS.

2. **Unreasonable Rate Increase (Modified):** the issuer modified its proposed rate increase during the review process and the modified rate increase was determined to be unreasonable based on a review by a State or CMS.

3. **Unreasonable Rate Increase: Rejected by State**: the rate increase was determined to be unreasonable and rejected based on a review by a State.

4. **Not Unreasonable:** the rate increase was determined to be not unreasonable based on a review by a State or CMS review.

5. **Not Unreasonable (Modified):** the issuer modified its proposed rate increase during the review process and the modified rate increase was determined to be not unreasonable based on a review by a State or CMS.

6. **Withdrawn Prior to Determination:** the rate increase will be assigned this determination when issuers elect to withdraw the rate increase prior to the completion of the State's or CMS' review.

When a review determination is entered into HIOS, registered HIOS users will receive an email notification with the determination. Additionally, the status will be updated in HIOS to reflect the review determination and the information on healthcare.gov will be updated with the review determination and other information about the review.

Slide 41

Issuers must submit a Final Justification for unreasonable rate increase determinations, if they intend to implement the rate increase.

The Final Justification must be submitted within 10 calendar days of the rate review determination. Issusers do not have to submit the final justification if they withdraw the rate increase within 10 calendar days of the determination.

The final justification should provide a non-technical explanation of why the issuer is implementing a rate increase that was found to be unreasonable. It should speak to the specific experience or assumptions behind the increase

Issuers do not have to submit a final justification for a record with a unreasonable rate increase (rejected by state) status as this status denotes that the rate will not be implemented.

Slide 42

Issuers may access records in HIOS with unreasonable rate increase determination by using the submission status report search feature. On the review rate data page, Issuers should enter their final justification in the text box labeled 'Issuer Unreasonable Rate Increase Justification'. This text box is only enabled for records with unreasonable rate increase determinations.

Issuers should click 'save' on the review rate page to save their unreasonable rate increase submission.

The status in HIOS will updated to reflect the submission of the final justification- the status will be changed from Unreasonable rate increase pre final justification submission to unreasonable rate increase final justification submitted.

Slide 43

Following a state or CMS review determination, issuers must use the withdraw function in HIOS to indicate to indicate changes to the rate increase that occur between the date of the determination and the implementation date of the rate increase. The 'modify submission button' on the review rate page is automatically replaced with the 'withdraw button once a determination status has been assigned to the record.

Use of the withdraw feature will not suppress the display of information on the record on healthcare.gov, nor will it remove the rate review determination status from the public website. Rather the public information provided on this record will be amended to indicate that the rate increase was withdrawn after the rate review determination.

If an issuer is using the withdraw function in HIOS to denote a change in the rate increase as opposed to a complete withdrawal of the increase. The issuer would be required to submit a new preliminary justification for the rate increase if it is at or above the subject to review threshold. In other words, any change to a rate increase after a determination has been issued, restarts the rate review reporting requirements for the product.

The "withdraw" feature is not available for records with an "Unreasonable (Rejected by State) determination, as this determination status implies that the rate increase will not be implemented.

To use the withdraw feature in HIOS click on the withdraw button on the review rate data page. The status of the record will be amended to indicate that the record has been withdrawn. For example a record with an unreasonable determination will be changed to Unreasonable (Withdrawn).

Slide 44

During this training we have covered three HIOS features that issuers can use to document changes to submissions.

The delete feature is available to issuers on the review rate data page prior to attestation. Issuers should use this feature to 'delete records with identified errors prior to attestation. These records will not be removed from the HIOS system, but they will be labeled as deleted. No information will be web-posted and no review determination will be assigned to these records.

The modification feature is available to issuers on the review rate data page while the review is in progress in between attestation and when a determination is entered into HIOS. This feature should only be used for CMS reviews. Issuers should use the modification feature to provide information to CMS on any changes in the rate increase or underlying assumptions or data that would have a material impact of CMS' review of the increase.

The withdraw feature is available on the review rate data page after the determination phase. Issuers should use this feature when a rate increase has been withdrawn or modified following the rate review determination. If this feature is used, issuers must submit a new preliminary justification for any new or modified rate increase associated with the product.

Slide 45

As discussed throughout this training, CMS will web post the preliminary justification and information on the review determination. CMS will conduct a content review of the preliminary justification prior to web-posting. In particular CMS will look at part II- the written explanation of the rate increase- and assess whether it is consistent with the data contained in part I of the preliminary justification. Additionally CMS will review Part III to ensure that issuers are appropriate following CMS' redaction guidance.

CMS, will also do a content review of final justification submission. Issuers will have to resubmit a new final justification if the final justification includes information that is not relevant to the rate increase.

Slide 46

Issuers must post all Final Justification and Preliminary Justifications for unreasonable rate increases on their web-site for 3 years.

Information must be posted in a prominent location on an issuers website. Issuers may satisfy this requirement by providing a link to the product-specific rate review information on healthcare.gov. Additional technical details about this requirement are provided in the Issuer Rate Review Instructions manual.

Title: Contacts:

Thank you for taking the Rate Review training. If you have questions about this training, please email them to RateReview@hhs.gov. Questions submitted will be addressed in the CMS Rate Review User Group calls that will take place in August and September. Please see the training confirmation email we sent you for details.