HIOS MLR TRAINING SESSION

Filing Medical Loss Ratio Annual Reports through HIOS

May 2018

Agenda - Training

- Welcome
- Overview
- System Walkthrough
- Next Steps and Wrap up
- Q&A

Welcome

- Objective
  - Provide general information on the MLR reporting process.
  - Provide specific steps for filing your MLR reports.
- Approximately 45 minute session with Q&A at the end.
- Please hold your questions until the end.

Overview – MLR Program

- The Patient Protection & Affordable Care Act requires health insurance issuers to report data on major categories of spending of policyholder premium, including the portion of premium revenues spent on clinical services provided to enrollees, quality improvement activities, & on all other non-claims costs. The proportion of premium spent on clinical services and quality is known as the Medical Loss Ratio (MLR).

- The Center for Consumer Information and Insurance Oversight (CCIIO) Medical Loss Ratio (MLR) division collects the MLR data.

Overview – MLR Program (continued)

- The Health Insurance Oversight System (HIOS) Medical Loss Ratio Reporting System (MLR module) has been identified as the system of record to support the collection of the MLR data.

- The MLR data will be collected using Excel templates (MLR Annual Reporting Form).

- The submission window for the 2017 reporting year will open on June 30, 2018.

- Submissions for the 2017 reporting year are due by **July 31, 2018.**

The MLR Reporting Process – Step 1

The MLR reporting process involves the following steps:

Step 1 – Access the HIOS MLR module.

Step 2 – Confirm company-issuer associations.

Step 3 – Download MLR templates.

Step 4 – Populate MLR templates.

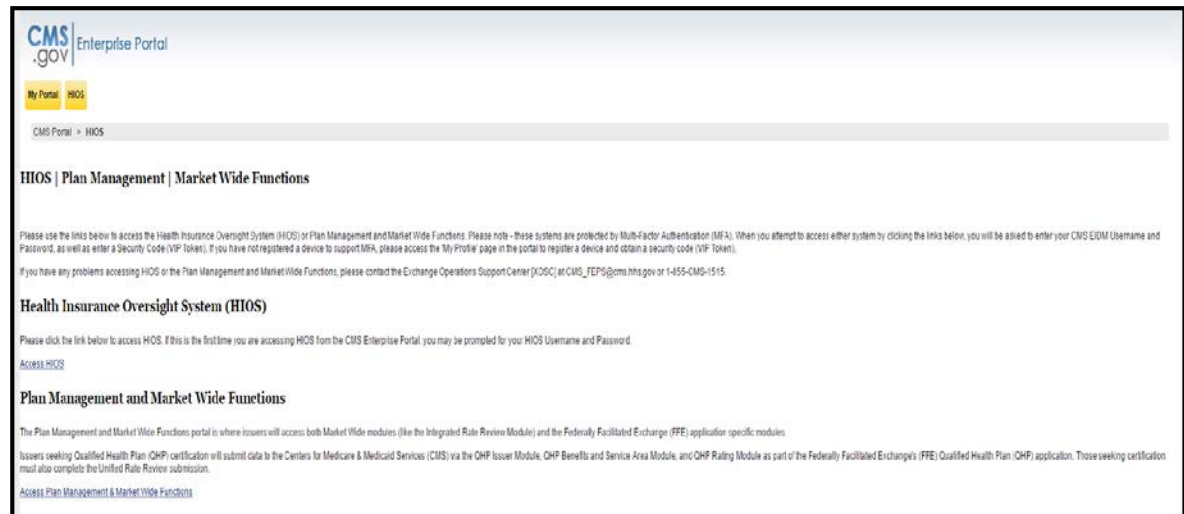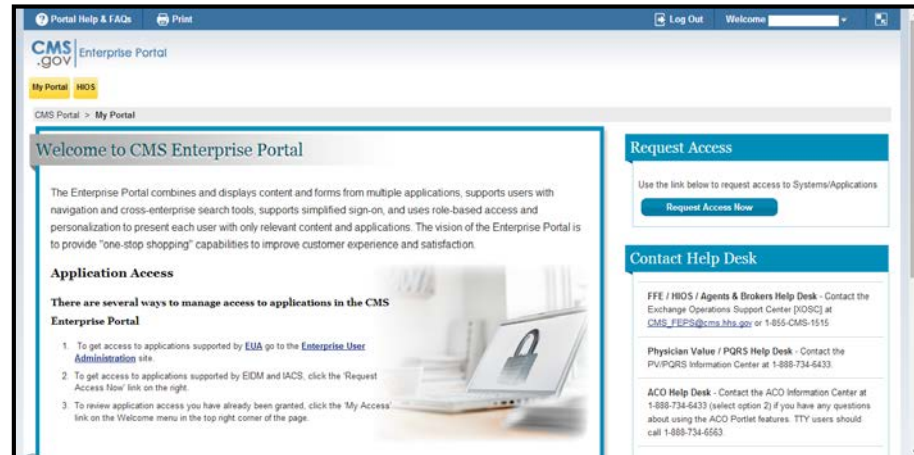Step 5 – Upload completed MLR templates.

Step 6 – Upload supplemental materials.

Step 7 – Attest to accuracy of uploaded MLR data and supplemental materials.

Step 8 – View Data

Accessing HIOS

- Users will log into the CMS Enterprise Portal with their EIDM Credentials.
  - HIOS can be accessed through the CMS Enterprise Portal at http://portal.cms.gov
  - New users will need to create EIDM account and request HIOS access

- Select the Access HIOS link; user will be redirected to the HIOS Home page.

Access HIOS through CMS Enterprise Portal

- To access the system, select the MLR module and select the '**Launch This Module'** button on the HIOS homepage.

MLR Homepage

The MLR Reporting Process – Step 2

The MLR reporting process involves the following steps:

Step 1 – Access the HIOS MLR module. ✓

Step 2 – Confirm company-issuer associations.

Step 3 – Download MLR templates.

Step 4 – Populate MLR templates.

Step 5 – Upload completed MLR templates.

Step 6 – Upload supplemental materials.

Step 7 – Attest to accuracy of uploaded MLR data and supplemental materials.

Step 8 – View Data

Purpose of Confirming Company-Issuer Associations

- Every company will need to confirm the list of its associated issuers to report MLR data for the reporting year (i.e., for which States it will be reporting).

- HIOS will utilize the list of confirmed issuers to generate an MLR template for each issuer, with the pre-populated company and issuer information *(e.g., Company Name, HIOS ID, FEIN, etc.).*

- The list is also be used to verify the appropriate amount of MLR templates have being submitted.

- Uploader users are not able to download the pre-populated MLR templates until issuer associations are confirmed.

Confirming Company-Issuer Associations

- Navigate to the "Confirm Issuers" page
- Select the "Company" and "Reporting Year".
- Select the "Next" button.
- Indicate if your company has only a small closed block of business as described in the 2017 MLR Annual Reporting Form Instructions.
- Indicate your company 's federal tax exempt status, as established by the Internal Revenue Service.
- View the list of issuers associated to company.
- Confirm the list of issuers by selecting "Confirm" button

Generating Company-Issuer Association Form

- Select the "Generate File" button.
- System will generate the company-issuer association form.
  - (Note: This process can take up to 15 minutes and user will need to refresh the page).
- System will display form link once generation has completed.
- Select the **Company-Issuer Association Form** link to download the form.

MLR Company-Issuer Association Form Example

MLR Company-Issuer Association Form

Please review all issuer information, and make updates if necessary, for the MLR module of the Health Insurance Oversight System (HIOS). If updates to the company details displayed below are necessary, refer to HIOS Portal to edit the details, by selecting the 'Manage an Organization' link. Please note the updated company details will only be reflected once the MLR Company-Issuer Association form is downloaded again.
Note: Asterisk (*) denotes a required field.

FEIN: 123123123	**A.M. Best Number:**	**Domiciliary Address Line 1:** 123 Street	
Company Name: Company 123	**NAIC Company Code:** 12345	**Domiciliary Address Line 2:**	
Not-for-Profit?: Yes	**NAIC Group Code:**	**Domiciliary City:** Fairfax	
DBA / Marketing Name: Company 123	**NAIC Group Name:** Company ABCD	**Domiciliary State:** Virginia	
		Domiciliary Zip: 22124	
		Domiciliary Zip Plus 4:	

Please complete this portion of the MLR Company -Issuer Association Form to do either of the following within the MLR module of the Health Insurance Oversight System (HIOS).
- To add an Issuer-to-Company association, enter the existing HIOS Issuer ID and State. Please refer to HIOS Portal for the appropriate HIOS Issuer ID, by selecting 'Manage an Organization' link.
- To remove an existing Issuer-to-Company association, select "Delete" in the Action column
- To keep an existing Issuer-to-Company association unchanged, please leave the row unchanged
- **Any changes to the Individual, Small Group, or Large Group health insurance coverage fields on this Form will not impact any other HIOS modules (e.g. PlanFinder, Rate Review, etc.)**

	HIOS Issuer ID*	State*	Health Insurance Coverage*			Mini-Med*			Expatriate*		Student Health*	Action
			Individual	Small Group	Large Group	Individual	Small Group	Large Group	Small Group	Large Group	Individual	
1	72721	VT	Yes	Yes	No	No	No	Yes	Yes	Yes	Yes	
2	36486	MA	No	No	No	No	No	No	No	No	Yes	Delete
3												
4												
5												

Updating Company-Issuer Associations

- Update the pre-populated form to add or remove any issuers.
- Upload the updated form back to the MLR module.
- Once form is processed, view the updated list of associated issuers.
  - Email notification will be sent once form is processed.
- Confirm the list of issuers by selecting "Confirm" button.

Upload Company-Issuer Association Form

Please Browse and Add the Company-Issuer Association Form for your company. Files must have a .xls or .xlsx extension and cannot have file names that contain spaces or are longer than 100 characters.

| BROWSE | No Files selected | Add |

UPLOAD

Confirmation

If the company issuer associations are correct for the reporting year, please confirm:

I have examined the data in the Company-Issuer Associations list for my organization. To the best of my knowledge, it accurately represents the company-level business setup and organization of my company and the states in which the company has business subject to MLR.

CONFIRM

The MLR Reporting Process – Step 3

The MLR reporting process involves the following steps:

Step 1 – Access the HIOS MLR module. ✓

Step 2 – Confirm company-issuer associations. ✓

Step 3 – Download MLR templates.

Step 4 – Populate MLR templates.

Step 5 – Upload completed MLR templates.

Step 6 – Upload supplemental materials.

Step 7 – Attest to accuracy of uploaded MLR data and supplemental materials.

Step 8 – View Data

Overview of Downloading MLR Templates

- Each company will have access to a set of MLR template files for each of its associated issuers with pre-populated company information, as well as an MLR template for the company's national Grand Total numbers.

- Uploader users will need to generate the MLR template zip file.

- Once generated, the system will provide a zip file containing all MLR template files for the selected company and MLR reporting year.

- The zip file will only become available for download after company-issuer associations have been confirmed.

Generating the MLR Templates

- Navigate to the "Download Templates" page.

- Select the "Company" and "Reporting Year".

- Select the "Next" button.

- Select the "Generate File" button.

- System will generate the MLR templates (Note: This process can take up to 15 minutes and user will need to refresh the page).

- System will display template zip link once generation has completed.

Downloading the MLR Templates

- Select the **MLR Template** zip file link to download the templates.
- The zip file contains pre-populated MLR Templates; one for each issuer plus Grand Total template (named "HHS-MLR-2017.zip").
- Extract the contents of the zip file into a folder on your computer.

Generate File

Please select the "Generate Files" button to generate the MLR .zip file and the Attestation Form.

GENERATE FILES

File(s) to Download:

The MLR .zip file contains all of the state templates and the Grand Total template for your company.

HHS-MLR-2017-20180426195816.zip(1 MB, ZIP)

Last generated on 04/26/2018 7:58:18 PM

The Attestation form (.pdf format) contains the CEO/CFO Attester statements.

Attestation-Form.pdf(0.06 MB, PDF)

The MLR Reporting Process – Step 4

The MLR reporting process involves the following steps:

Step 1 – Access the HIOS MLR module. ✓

Step 2 – Confirm company-issuer associations. ✓

Step 3 – Download MLR templates. ✓

Step 4 – Populate MLR templates.

Step 5 – Upload completed MLR templates.

Step 6 – Upload supplemental materials.

Step 7 – Attest to accuracy of uploaded MLR data and supplemental materials.

Step 8 – View Data

Populating the MLR Template

- Populate all cells applicable to your block of business:
  - **White** cells indicate that data entry by the user is permitted.
  - **Grey** cells indicate that no data entry is permitted. Entering data in the gray cells will result in an upload failure.
  - **Green** cells indicate that a calculation by the issuer is required according to the MLR Form instructions (values are not auto-calculated).
  - Tool-tips are used to explain the meaning of each colored cell within the template

Part 1 Summary of Data						
Line Description	**SHCE**	**1** **Health Insurance** **INDIVIDUAL** **Total as of** **12/31/14**	**2** **Health Insurance** **INDIVIDUAL** **Total as of 3/31/15**	**3** **Health Insurance** **INDIVIDUAL** **Dual Contracts** **(Included in Total** **as of 3/31/15)**	**4** **Health Insurance** **INDIVIDUAL** **Deferred PY1** **(Add)**	
1. Premium						
1.1 Total direct premium earned						
1.2 Federal high risk pools	Pt 1, Ln 1.2					
1.3 State high risk pools	Pt 1, Ln 1.3					
1.4 Net assumed less ceded reinsurance premium earned (exclude amounts already reported in Line 1.1)	Pt 1, Ln 1.9					
1.5 Other adjustments due to MLR calculations - premium	Pt 1, Ln 1.10					
1.6 Risk revenue	Pt 1, Ln 1.11					
2. Claims						
2.1 Total incurred claims (MLR Form Part 2, Line 2.16)						
2.2 Prescription drugs (informational only; already included in total incurred claims above)	Pt 1, Ln 2.2					
2.3 Pharmaceutical rebates (informational only; already excluded from total incurred claims above)	Pt 1, Ln 2.3					
2.4 State stop loss, market stabilization and claim/census based assessments (informational only; already excluded from total incurred claims above)	Pt 1, Ln 2.4					

Populating the MLR Template continued

- You can copy and paste blocks of data.

- When copying and pasting, select the Paste Values option in order to prevent inadvertently modifying the template. Alternatively, use the MLR Calculator to calculate and copy data into the MLR template.

- The data entered on the Grand Total MLR template should be an aggregate of the data for all states. Data for experience that is to be reported only at the national level (Expatriate and Student Health Plans) should be entered only on the Grand Total MLR template.

- Save the completed MLR template file for upload to the MLR module.

The MLR Reporting Process – Step 5

The MLR reporting process involves the following steps:

Step 1 – Access the HIOS MLR module. ✓

Step 2 – Confirm company-issuer associations. ✓

Step 3 – Download MLR templates. ✓

Step 4 – Populate MLR templates. ✓

Step 5 – Upload completed MLR templates.
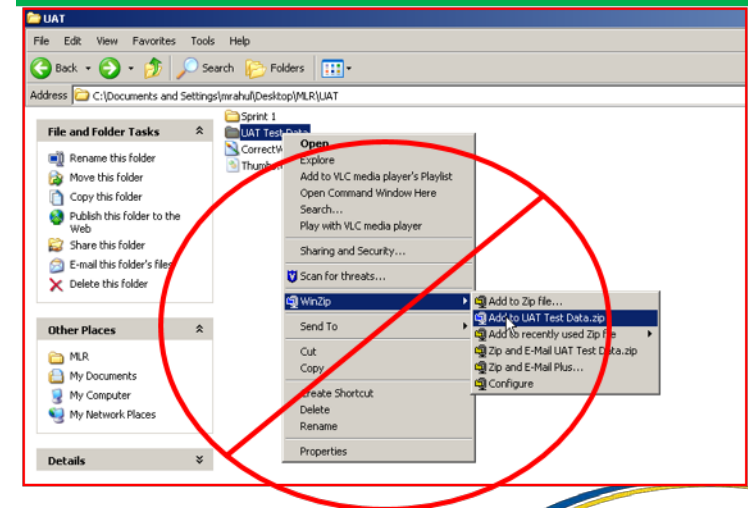
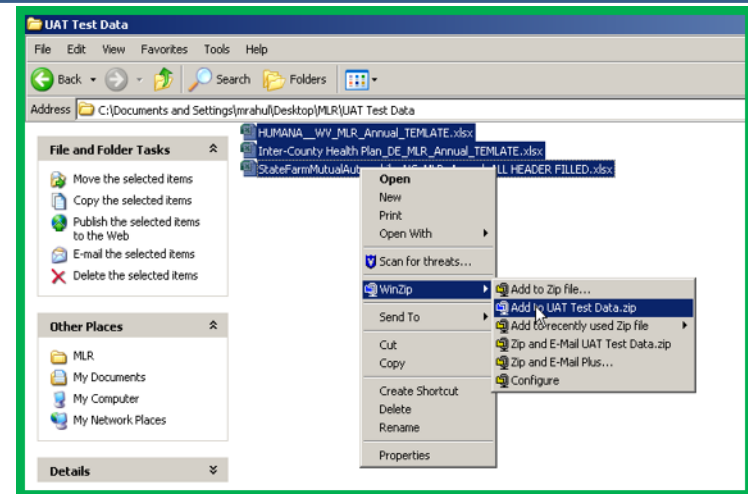Step 6 – Upload supplemental materials.

Step 7 – Attest to accuracy of uploaded MLR data and supplemental materials.

Step 8 – View Data

Combining Completed MLR Templates into Zip File

You must combine all completed MLR templates into a single zip file:

- **CORRECT:** Open the folder. Select <u>all</u> Excel files. Right-click the selected files, choose "WinZip" and "Add to Zip file…" option OR choose "Send to" and "Compressed (zipped) folder" option. Type a file name at the end of the directory.

  - **Note:** No spaces are allowed in the zip file name.

- **INCORRECT:** Do NOT zip the files at the folder level. Files will fail to upload.

Uploading the Zip File – Step 1

- Navigate to the 'Upload' page.

- Select the "Company" and "Reporting Year".

- Select the **MLR Annual Form** from the "File Type" drop down.

- Select the "Next" button.
  - If incorrect values were selected in above steps, the user can change values by selecting the **'Revisit this step'** button.

Uploading the Zip File – Step 2

- Select the **'Browse'** button to browse for a file to upload.

- Select the **'Add'** button to add the file.
  - If incorrect file was selected, select the **'Remove'** button to remove the file. User will need to browse and select file again.
  - Note: No spaces are allowed in the zip file name.

- Select the **'Next'** button.

Please note, a field with an asterisk (*) before it is a required field.

1	Select Company, Reporting Year, File Type	Revisit this step

Test Company
Reporting Year 2017
Upload MLR Annual Form

2	Select a File

Please Browse and Add the MLR Annual Form for your company. The MLR template zip file must only contain MLR templates for each associated issuer and the Grand Total template. The selected file(s) must be .zip format and cannot contain spaces in the file name.

*Browse for file

BROWSE   Add

File(s) to Upload

MLR_Test_File.zip   REMOVE

NEXT

3	Upload your File

Uploading the Zip File – Step 3

- Review the selected file details (i.e.: Company, Reporting Year, File Type, File selected, Associated States, etc.).

- Select '**Submit'** button to upload file for processing.

- The system will display confirmation message indicating to the user the file is being processed.

Upload Confirmation

- All Uploaders and Attesters will receive a confirmation email once the zip file has been uploaded successfully. The email will identify any validation warnings.

- If the upload fails, the Uploaders will receive an email indicating the reasons why the upload failed.

- Once successfully uploaded, the MLR data is ready for review and attestation.

The MLR Reporting Process – Step 6

The MLR reporting process involves the following steps:

Step 1 – Access the HIOS MLR module. ✓

Step 2 – Confirm company-issuer associations. ✓

Step 3 – Download MLR templates. ✓

Step 4 – Populate MLR templates. ✓

Step 5 – Upload completed MLR templates. ✓

Step 6 – Upload supplemental materials.

Step 7 – Attest to accuracy of uploaded MLR data and supplemental materials.

Step 8 – View Data

Supplemental Materials

- Companies may submit supplemental materials to justify or explain the data reported on any of the MLR templates.

- Submitting supplemental materials is optional and not required for attestation to the accuracy of the MLR submission.

- The MLR templates must be uploaded and successfully processed *before* uploading supplemental materials.

  - Note: No spaces are allowed in the supplemental material file names.

  - Only PDF and MS Word documents are allowed.

Uploading Supplemental Materials – Step 1

- Navigate to the 'Upload' page.

- Select the "Company" and "Reporting Year".

- Select **Supplemental Materials** from the "File Type" drop down.

- Select the "Next" button.
  - If incorrect values were selected in above steps, the user can change values by selecting the **'Revisit this step'** button.

1

Uploading Supplemental Materials – Step 2

- Select the **'Browse'** button to browse for a file to upload.

- Select the **'Add'** button to add the file.
  - If incorrect file was selected, select the **'Remove'** button to remove the file. User will need to browse and select file again.
  - Note: No spaces are allowed in the file name.

- Select the **'Next'** button.

Uploading Supplemental Materials – Step 3

- Review the selected file details (i.e.: Company, Reporting Year, File Type, File selected, Associated States, etc.).

- Select **'Submit'** button to upload file for processing.

- The system will display confirmation message indicating to the user the file is uploaded successfully.

The MLR Reporting Process – Step 7

The MLR reporting process involves the following steps:

Step 1 – Access the HIOS MLR module. ✓

Step 2 – Confirm company-issuer associations. ✓

Step 3 – Download MLR templates. ✓

Step 4 – Populate MLR templates. ✓

Step 5 – Upload completed MLR templates. ✓

Step 6 – Upload supplemental materials. ✓

Step 7 – Attest to accuracy of uploaded MLR data and supplemental materials.

Step 8 – View Data

Attesting to the Uploaded Data

- The attestation process requires the CEO and CFO attester to sign a hard-copy form that is downloaded by the uploader from the "Download Templates" page of HIOS.

- **Note: Attesters are NOT required to register or access HIOS MLR to complete the attestation process.**

- The Uploader user will upload the signed Attestation Form to the system.

Generate File

Please select the "Generate Files" button to generate the MLR .zip file and the Attestation Form.

GENERATE FILES

File(s) to Download:

The MLR .zip file contains all of the state templates and the Grand Total template for your company.

HHS-MLR-2017-20180426195816.zip(1 MB, ZIP)

Last generated on 04/26/2018 7:58:18 PM

The Attestation form (.pdf format) contains the CEO/CFO Attester statements.

Attestation-Form.pdf(0.06 MB, PDF)

Uploading Attestation Form – Step 1

- Navigate to the 'Upload' page.

- Select the "Company" and "Reporting Year".

- Select **Attestation Form** from the "File Type" drop down.

- Select the "Next" button.
  – If incorrect values were selected in above steps, the user can change values by selecting the **'Revisit this step'** button.

Medical Loss Ratio

Confirm Issuers

Download Templates

Upload

View Data

Upload

Please note that only the MLR templates downloaded from HIOS will be accepted. The MLR templates must be uploaded and successfully processed before you can upload the Risk Corridors Plan Level Data templates, Supplemental Materials, and Attestation Form.

Please note, a field with an asterisk (*) before it is a required field.

1 Select Company, Reporting Year, File Type

Please select a Company, Reporting Year and File Type below:

* Company

Select Company ▼

* Reporting Year

Select Year ▼

* File Type

Select a File Type ▼

NEXT

2 Select a File

3 Upload your File

Uploading Attestation Form – Step 2

- Select the **'Browse'** button to browse for a file to upload.

- Select the **'Add'** button to add the file.
    - If incorrect file was selected, select the **'Remove'** button to remove the file. User will need to browse and select file again.
    - Note: No spaces are allowed in the file name.

- Select the **'Next'** button.

Uploading Attestation Form – Step 3

- Review the selected file details (i.e.: Company, Reporting Year, File Type, File selected, Associated States, etc.).

- Select '**Submit**' button to upload file for processing.

- The system will display confirmation message indicating to the user the file is uploaded successfully.

- The MLR data and supplemental materials have now been attested the filing is complete.

The MLR Reporting Process – Step 8

The MLR reporting process involves the following steps:

Step 1 – Access the HIOS MLR module. ✓

Step 2 – Confirm company-issuer associations. ✓

Step 3 – Download MLR templates. ✓

Step 4 – Populate MLR templates. ✓

Step 5 – Upload completed MLR templates. ✓

Step 6 – Upload supplemental materials. ✓

Step 7 – Attest to accuracy of uploaded MLR data and supplemental materials. ✓

Step 8 – View Data

View Data

- This page provides company Uploader and Attester users with the ability to view the uploaded MLR data, Supplemental Material file(s) and Attestation Form.

- The Warnings and Comparison Report also provides users with reports
  - Validation Warnings: Inconsistencies and unusual data on a state report
  - Grand Total Warnings: Inconsistencies and unusual data on the Grand Total report
  - MLR Calculation Tab: Discrepancies between user-entered values and HIOS-calculated values
  - SHCE/MLR-A Warnings: Discrepancies between an issuer's 2017 SHCE values (as of 4/20/18) and the values reported in the "12/31" columns of the 2017 MLR Annual Reporting Form

View Data (continued)

- Navigate to the 'View Data' page.

- Select the "Company" and "Reporting Year".

- The uploaded MLR data, Supplemental Material file(s) and Attestation Form will be displayed in the appropriate uploaded data section.
    - Only files that have been uploaded and successfully processed will be displayed. If no files have been uploaded and successfully, the applicable data section will provide message indicating such.

- The user can download the uploaded data by selecting the link for each document.

Submission Status

Status: Attested

MLR Submission

Uploaded File	**Warnings and Comparison Report**
MLR_OK_Perfect_Upload.zip(313 KB, ZIP)	View Report
	Uploaded Date/Time
Uploaded By	03/19/2018 2:10:36 PM
Test User	
	Resubmission Requested
Version	No
1	

Attestation Form

Uploaded File	**Version**
Attestation_Form.pdf(2 MB, PDF)	1
Uploaded By	**Uploaded Date/Time**
Test User	03/19/2018 6:33:56 PM

Supplemental Materials

Showing 1-2 of 2 records   Records per page 10 ▼

File Name ⇅	Uploaded Date/Time ▲	Uploaded By ⇅	Action
MLR_Supplemental_Material (26.1KB, DOCX)	10/04/2017 3:45:43 PM	Test User	Remove
Supplemental_Material 2.pdf(2.6MB, PDF)	10/05/2017 12:24:09 PM	Test User	Remove

First   Previous   **1**   2   Next   Last

View the Warnings and Comparison Report

- Navigate to the 'View Data' page.

- Select the "Company" and "Reporting Year".

- Select the 'Next' button.

- Under the MLR Submission section, select the 'View Report' link.

- System displays the Warnings and Comparison Report consisting of the following tabs :
  – Validation Warnings Report
  – Grand Total Warnings Report
  – MLR Calculation Warnings Report
  – SHCE/MLR-A Warnings Report

- Users can also export the report by selecting on the 'Export to Excel' button.

The MLR Reporting Process – Completed

The MLR reporting process involves the following steps:

Step 1 – Access the HIOS MLR module. ✓

Step 2 – Confirm company-issuer associations. ✓

Step 3 – Download MLR templates. ✓

Step 4 – Populate MLR templates. ✓

Step 5 – Upload completed MLR templates. ✓

Step 6 – Upload supplemental materials. ✓

Step 7 – Attest to accuracy of uploaded MLR data and supplemental materials. ✓

Step 8 – View Data. ✓

Contacts & Additional Resources

- Email:
    - MLR policy matters: MLRQuestions@cms.hhs.gov.
    - Technical matters: CMS_FEPS@cms.hhs.gov (Marketplace Service Desk)
- Telephone:
    - Technical matters: 855-267-1515 (Marketplace Service Desk)
- HIOS MLR User Guide:
    - Accessible on the HIOS MLR module via the Related Links and HIOS Knowledge Center. Also posted here: https://www.cms.gov/CCIIO/Resources/Training-Resources/index.html

2017 Medical Loss Ratio Reporting

Center for Consumer Information and Insurance Oversight

May 2018

Agenda – Reporting

- Changes to the 2017 MLR Annual Reporting Form
- Data Aggregation
- MLR Calculator
- Data Validations
- Companies with only small blocks of grandfathered business

2017 MLR Annual Reporting Form Changes

Main Changes to the MLR Annual Reporting Form for 2017:

- Deleted risk corridors columns in Parts 1-3 and lines in Part 3 related to the risk corridors calculations.

  - Transitional reinsurance and risk corridors amounts related to prior benefit years must still be reported on Part 3 Lines 1.5 and 1.7, respectively (as well as any such amounts deferred last year in connection with new business on Part 2, if applicable).

- Added new Line 4.6 on Part 1 to effectuate the standardized QIA reporting option.

- Added new Line 5.5c on Part 1 to collect data on employment taxes separately from other non-deductible taxes.

Aggregating Experience

All issuers are required to aggregate three years of experience

- Enter 2017 data in Parts 1 and 2; Part 3 Column CY; and Part 4 Sections 1-3
- Enter 2016 data in Part 3 Column PY1; and Part 4 Section 4
  - Restate 2016 incurred claims (including reserves and the allowable fraud reduction expense) as of 3/31/2018 in Part 3 Line 1.2 Column PY1
- Enter 2015 data in Part 3 Column PY2
  - Restate 2015 incurred claims (including reserves and allowable fraud reduction expenses) as of 3/31/2018 on Part 3 Line 1.2 Column PY2.
- Aggregate data for 2015, 2016 & 2017 in Part 3 Total Column
  - MLRs are calculated using aggregated data
  - Rebates are calculated using only 2017 adjusted premium

MLR Calculator

- CMS will post an Excel calculator tool with built-in MLR and rebate calculations on the CCIIO website

- To use the MLR Calculator, enter:
  - Issue State and Federal tax exempt status in Company Information tab
  - 2017 data in white cells of Parts 1 and 2
  - 2015 and 2016 data in white cells of PY2 and PY1 columns, respectively, in Part 3
  - Average deductible in Part 3

MLR Calculator (cont'd)

- After the MLR Calculator calculates the values in all green cells, copy the data into the 2017 MLR Annual Reporting Form (downloaded from HIOS) using one of the following methods:
  - Use the "Copy to HIOS Template" macro in the Start Here tab of the Calculator to copy the entire form (Parts 1-5)
    - Note that this will overwrite any information already entered on the HIOS template with information entered on the MLR Calculator
  - **OR** –
  - Manually copy and "paste values" into the HIOS MLR template
    - Note that you cannot paste over gray cells that divide sections or correspond to purely descriptive lines

Data Validations

- Submissions undergo several automated data checks in HIOS
  - Validation *errors* (e.g. text entered in a numeric field) must be corrected prior to attestation
  - Validation *warnings* indicate unusual data (e.g. negative member months) but do not prevent a user from attesting
- Warning emails sent to the issuer only contain some of the validation failures
- The full list of validation failures related to a particular MLR submission can be found on the Warning and Comparison Report in HIOS
- Issuers should review both the validation errors and warnings in their respective HIOS Reports to ensure accuracy and completeness of the data submitted

Warning and Comparison Report

- The Warning and Comparison Report is available on the "View Data" page in HIOS
- The report has four tabs:
  - Validation Warnings: Inconsistencies and unusual data on a state report
  - Grand Total Warnings: Inconsistencies and unusual data on the Grand Total report
  - MLR Calculation Tab: Discrepancies between user-entered values and HIOS-calculated values
  - SHCE/MLR-A Warnings: Discrepancies between an issuer's 2017 SHCE values (as of 4/20/18) and the values reported in the "12/31" columns of the 2017 MLR Annual Reporting Form

Small Blocks of Grandfathered Business Criteria

Issuers do not have to complete all sections of the 2017 MLR Annual Reporting Form if they satisfy <u>all</u> of the following criteria:

1. Ceased offering health insurance coverage in every market and state in which it is licensed to offer health insurance coverage;

2. Have only grandfathered health plans in closed blocks of business that are in run-off;

3. Are exempted by the domiciliary state from filing an SHCE or similar state filing;

4. Have less than 1,000 life years nationwide (combined for all health insurance coverage) for 2017; and

5. Have fewer than 1,000 life-years (combined for 2015+2016+2017) in each state market where they provide coverage.

Reporting Small Blocks of Grandfathered Business

An issuer that meets all of the criteria should:

- Select "Yes" in the "small closed blocks of business" box on the HIOS "company-issuer association" screen
- Complete only Part 3 Line 3.1 for all columns (PY2, PY1, CY, Total) of the MLR Annual Reporting Form in every applicable state and market
- Use the HIOS "supplemental upload" function to submit:
  - Documentation of a filing exemption from the domiciliary state
  - A statement affirming that the issuer meets the small closed block criteria
- Review and attest to the submission

Questions and Resources

- For HIOS questions, please contact the Marketplace Service Desk at CMS_FEPS@cms.hhs.gov or 855-267-1515

- For questions related to the MLR Annual Reporting Form, please email CCIIO at MLRQuestions@cms.hhs.gov

- CCIIO will host MLR Q&A conference calls every Wednesday from June 13 through July 25 (except July 4) from 1-2:30 pm EDT.
  - Call in information: 1-877-267-1577, Meeting ID # 995 252 926

- CCIIO's MLR website is http://www.cms.gov/CCIIO/Programs-and-Initiatives/Health-Insurance-Market-Reforms/Medical-Loss-Ratio.html