DEPARTMENT OF HEALTH & HUMAN SERVICES Centers for Medicare & Medicaid Services 7500 Security Boulevard, Mail Stop C2-21-15 Baltimore, Maryland 21244-1850



DATE: April 20, 2012

TO: Issuers of Health Insurance

FROM: Brian James

CCIIO Data Collection and Management Division

SUBJECT: HIOS Small Group Open Window

As announced in a previous memo and on the weekly issuer calls, the HIOS Small Group submission window for Q1, 2012 data, will open Monday, April 23, and will remain open until 11:59 PM on Monday, May 7. The pre populated templates are currently available. This is a very important HIOS data collection window, as the information collected in this window will be used by States in making Essential Health Benefits determinations, as well as being an opportunity to correct any errors that may be present in your HIOS information in advance of DOIs evaluation. For this reason, we ask issuers to confirm that your submissions conform to the definition of "product" below, and to make sure your submission is otherwise accurate.

Definition of a Product: a Plan Finder "Health insurance product" is a unique package of benefits and coverage options that would typically be submitted to a State for approval at a policy form level. A product is **not** identified as a health insurance offering at the specific cost-sharing option level. This is defined as a Portal Plan.

A group of offerings should not be separated into different products on the basis of different cost sharing options or available, non-mandatory riders. For rate review, CMS only takes into account Portal "Health Insurance Products" and generally considers a rate filing submission to be "a package of health insurance coverage benefits with a discrete set of rating and pricing methodologies that a health insurance issuer offers in a State." An issuer can submit multiple Products into a single rate filing, if those products utilize an aggregated claims experience **and** if the rate increases are the same across all of those products.

If you have been incorrectly submitting in HIOS, you must correct these errors during this submission window. If you have been mistakenly submitting plans instead of products at the HIOS level, please follow these instructions to correct your submission:

- 1. Create a new Product ID in HIOS. Enter accurate information for that entire product as of Q1, 2012 (March 31, 2012).
- 2. Request deletion of the incorrectly entered products via an email to the HIOS help desk and the CCIIO Plan Finder inbox. Begin the subject line of the email with the words "DELETION REQUEST." **DO NOT** close the improperly submitted products, they must be deleted.
- 3. In the email, indicate which old "products" are being rolled up into each new Product ID. This is a crucial step in the process, and **NO** requests for deletion will be approved without this information.

We welcome any questions throughout this process: For policy questions regarding the HealthCare.gov Plan Finder, please email CCIIOPlanFinder@cms.hhs.gov.

For technical assistance regarding product-level data submissions, please contact the HIOS Help Desk at 1-877-343-6507 or insuranceoversight@hhs.gov.