Proposed Key Dates for Calendar Year 2019¹²: Qualified Health Plan (QHP) Certification in the Federally-facilitated Exchanges (FFEs)³; Rate Review; and Risk Adjustment

Table 1. QHP Certification in the FFEs

Initial QHP Application submission window	4/25/19 – 6/19/19 5/22/19
Ontional Farly Bird OUD Application submission deadling	5/22/19
Optional Early Bird QHP Application submission deadline	
2019 QHP Enrollee survey data submission deadline	5/24/19
CMS reviews Early Bird QHP Application data as of 5/22/19 and releases results	5/23/19 - 6/11/19
2019 QRS clinical data submission deadline	6/17/19
Initial QHP Application deadline	6/19/19
Initial deadline for QHP Application Rates Table Template	7/24/19
CMS reviews initial QHP Applications as of 6/19/19	6/20/19 - 8/2/19
CMS releases first correction notice	8/9/19
Service area data change request deadline	8/12/19
Issuers complete final plan confirmation in the PM Community	8/14/19 - 8/28/19
Deadline for issuers to change QHP Application	8/21/19
Transparency in Coverage data submission deadline	8/29/19 ⁴
CMS reviews QHP Applications as of 8/21/19	8/22/19 – 9/9/19
CMS sends QHP Certification Agreements	9/16/19

¹ These dates are subject to change.

² This document summarizes key dates for calendar year 2019 regarding some activities and policies that are outlined in other documents CMS is not soliciting additional comments on the substance of the underlying policies or proposed key dates through release of this document.

³ Includes QHPs in FFEs where states perform plan management functions.

⁴ Submission date is subject to change pending PRA approval.

CMS releases final correction notice	9/16/19
Limited data correction window	9/19/19 – 9/20/19
Issuers return signed Agreements and final plan crosswalks to CMS	9/16/19 – 9/24/19
States send CMS final plan recommendations	9/16/19 – 9/24/19
Machine Readable file posting deadline	9/27/19
CMS releases certification notice to issuers and states	10/3/19 – 10/4/19
Open Enrollment begins	11/1/19

Table 2. Rate Review for Single Risk Pool Coverage⁵

Activity	Dates
Submission deadline for issuers in a state without an Effective Rate Review Program to submit proposed rate filing justifications for single risk pool coverage into the Unified Rate Review (URR) module of HIOS.	6/3/19
Submission deadline for issuers in a state with an Effective Rate Review Program to submit proposed rate filing justifications for single risk pool coverage into the URR module of HIOS. ^{7 8}	7/24/19
Target date on which CMS will post proposed rate changes. ⁹	8/1/19
Deadline for all rate filing justifications for single risk pool coverage that include a QHP to be in a final status in the URR system. ¹⁰	8/21/19 ¹¹

⁵ Rate review dates from *Timing of Submission of Rate Filing Justifications for the 2019 Filing Year for Single Risk Pool Coverage Effective on or after January 1, 2020* (December 21, 2018), at https://www.cms.gov/cciio/index.html.

⁶ The term "single risk pool coverage" is used to describe non-grandfathered health insurance coverage in the individual or small group (or merged) market that is subject to the single risk pool provisions at 45 CFR 156.80 and required to submit rate information using the Unified Rate Review Template

⁷ We recommend that States with Effective Rate Review Programs served by the HealthCare.gov platform set a submission deadline no later than the deadline of June 19, 2019, for submission of rate filings that include QHPs to align with the FFE QHP filing deadlines; however, we understand some States may face challenges in doing so, and they will not be bound by this recommendation.

⁸ States with Effective Rate Review Programs are permitted to establish different submission deadlines for non-QHP only rate filings as long as the deadline is no later than July 24, 2019.

⁹ CMS will post rate filing information for all single risk pool coverage proposed rate increases (not just those subject to review). CMS will not post information that is a trade secret or confidential commercial or financial information as defined in HHS's Freedom of Information Act regulations at 45 CFR 5.31(d).

¹⁰ There are three final submission statuses in HIOS. All submissions that do not have any rate increases subject to review (rate increases less than 15%) must be in a state of "Rate Filing Accepted." For submission with rate increases that are subject to review (rate increase of 15% or greater), the submission must be in a status of "Review Complete" if the rate increase received a determination of "not unreasonable" or in a status of "Final Justification Submitted" if the rate increase received a determination of "unreasonable" and the issuer has submitted the final justification.

¹¹ Filings that include QHPs must be in final status by 3:00 p.m. EDT.

Deadline for all rate filing justifications for single risk pool coverage that include only non-QHPs to be in a final status in the URR system.	10/15/19 ¹²
Target date on which CMS will post <u>all</u> final rate changes. ¹³	11/1/19

Table 3. Risk Adjustment for Benefit Year 2018

Activity	Dates
Interim 2018 Benefit Year Risk Adjustment Report Released	March 2019
Deadline for Submission of Final 2018 Benefit Year Risk Adjustment Data	4/30/19
2018 Benefit Year Risk Adjustment Summary Report Released, including adjustments for 2017 benefit year risk adjustment data validation, as applicable.	By 6/28/19
Collection of 2018 Benefit Year Risk Adjustment Charges Begins	August 2019
2018 Benefit Year Risk Adjustment Payments Begin	September 2019

 $^{^{12}}$ Filings that include non-QHPs only must be in final status by 3:00 p.m. EDT.

 $^{^{13}}$ CMS will post rate change information for all single risk pool coverage final rates. CMS will not post information that is trade secret or confidential commercial or financial information consistent with HHS's Freedom of Information Act regulations at 45 CFR 5.31(d).