

Chapter 6: Instructions for the Network Adequacy Application Section

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1. Overview

Qualified Health Plan (QHP) issuers are required to maintain a network that is sufficient in number and types of providers, including providers that specialize in mental health and substance use disorder services, to ensure that all services will be accessible to enrollees without unreasonable delay. All issuers applying for QHP certification will need to attest that they meet this standard as part of the certification/recertification process, as described in 45 *Code of Federal Regulations* (CFR) 156.230(a)(2).

Both QHP and stand-alone dental plan (SADP) issuers are required to submit Network Adequacy information as part of their QHP Application. Therefore, all of the instructions in this document apply to both QHP and SADP issuers.

2. Purpose

The purpose of the Essential Community Providers (ECP)/Network Adequacy section of the QHP Application is to collect provider data (individual providers, facilities, and pharmacies) in each network associated with a QHP, including the National Provider Identification (NPI), provider name, provider address, and provider specialty. This data will be used to determine whether issuer networks meet the “reasonable access” standard.¹ This chapter guides issuers through the steps to complete the Network Adequacy section of the QHP Application.

¹ Reasonable access: sufficient number and types of providers to ensure reasonable access without delay.

3. Data Requirements

To complete this section, you need the following:

1. Access to the application system, either the Health Insurance Oversight System (HIOS) or the System for Electronic Rate and Form Filing (SERFF)
2. HIOS Issuer ID
3. Issuer state
4. Proposed market type (SERFF only)
5. Plan type (SERFF only)
6. Completed Network Template(s) to import Network IDs or the Network IDs for each of the proposed networks
7. A list of providers in each of the proposed networks, including NPI, provider first and last name, specialty and facility type, street address, city, state, county, and ZIP code.

4. Application Instructions

In this section of the QHP Application, issuers identify the providers included in each of the networks within their service areas. Issuers must use the 2017 ECP/Network Adequacy Template (located in the module, or located at <http://cciio.cms.gov/programs/exchanges/qhp.html>) to submit their data.

The ECP/Network Adequacy section of the QHP Application is composed of three parts:

1. A template for identifying contracted providers in the issuer's networks
2. Attestations to be completed in the Issuer Module of the QHP Application System
3. Justification, as needed, if an issuer believes that it has not met the network adequacy requirement, or if an issuer receives a correction notice identifying a network adequacy concern. An issuer may elect to submit a justification explaining how it will provide reasonable access to enrollees.

Figure 6-1 highlights key items in these instructions for completing the ECP/Network Adequacy section of the QHP Application.

Figure 6-1. Network Adequacy Section Highlights

- All of the instructions in this document apply to both QHP and SADP issuers as they are required to submit Network Adequacy information as part of their QHP Application.
- To complete the Network Adequacy section of the QHP Application, do the following:
 - Complete the Network Adequacy portion of the ECP/Network Adequacy Template
 - Enter responses to the Network Adequacy attestations in the Issuer Module of the QHP Application system.
 - Upload the ECP/Network Adequacy Template in the ECP/Network Adequacy Files Upload section in the module by clicking the **Browse** button to browse your computer for the zip file, followed by the **Upload** button to complete the upload.
 - Upload supporting document(s) in the module by selecting **Document Type**, clicking the **Browse** button to select the file, and then the **Upload** button to upload the supporting document(s).
 - Do not change the file names on your ECP/Network Adequacy files. The file-naming convention allows the Centers for Medicare & Medicaid Services (CMS) to easily identify your ECP/Network Adequacy Template. Changing the file name could cause the issuer to receive a correction notice.
- The current version of the ECP/Network Adequacy Template is available from the

4.1 Template Instructions

Please reference Chapter 18—Instructions for the ECP/Network Adequacy Template for information on completing the ECP/Network Adequacy Template.

4.2 Network Adequacy Attestation

Issuers must respond to all network adequacy attestations in the Issuer Module of the QHP Application System. Similar to the ECP/Network Adequacy Template, the Network Adequacy attestations have been combined with the attestations for ECP. The ECP/Network Adequacy section of the HIOS Module User Interface will consist of three questions; the last two questions are specifically for network adequacy (please refer to below—note the numbering corresponds to the HIOS screens):

2. Does the applicant attest to meeting all the requirements established under 45 CFR 156.230, including: maintaining a network that is sufficient in number and types of providers to assure that all services will be accessible without unreasonable delay in accordance with 45 CFR 156.230(a)(2). This includes providers that specialize in mental health and substance abuse services for all plans except stand-alone dental plans.
 - a. **Yes.** (Answer “Yes” if the applicant attests to meeting all requirements established under 45 CFR 156.230, which includes maintaining a sufficient network.)
3. Are you required to submit an ECP/Network Adequacy Template?
 - a. **Yes.** (Answer “Yes” if the applicant is a HIOS issuer, a SERFF issuer, or only offering indemnity plan design.)

All SERFF issuers must submit an ECP/Network Adequacy Template and supporting documentation [including those issuers that are offering only indemnity plan designs]. Indemnity plan designs should upload “dummy” data as explained below.)

- b. **No.** (Answer “No” if the applicant is a HIOS issuer and is offering only indemnity plan designs.)

Issuers² must complete the ECP/Network Adequacy Template and answer the attestation questions in the Issuer Module of the QHP Application System. Once the template is validated and completed, issuers must upload it to the ECP/Network Adequacy section of the Issuer Module of the QHP Application System. See Chapter 18 for full instructions on how to complete the ECP/Network Adequacy Template.

Indemnity Plan Designs

Depending on whether the issuer is submitting plans through HIOS or SERFF, the process for submitting information for those issuers offering indemnity plan designs will vary slightly, as follows:

- **For HIOS plans**, all issuers must submit the ECP/Network Adequacy Template and supporting documentation (with the exception of those issuers that are offering only indemnity plan designs).
- **For SERFF plans**, all issuers must submit the ECP/Network Adequacy Template and supporting documentation, including issuers that are offering indemnity plan designs. For the small number of indemnity plans, please enter the following “dummy” data (case-insensitive) into the template to allow validation of the ECP/Network Adequacy Template so that you may upload the associated .xml provider files into the Issuer module:

<i>NPI:</i>	Enter 1234567893
<i>First Name of Provider:</i>	Enter Abc
<i>Last Name of Provider:</i>	Enter Xyz
<i>Physician/Non-Physician:</i>	Select Physician
<i>Specialty Type:</i>	Select or enter 001 General Practice
<i>Street Address:</i>	Enter 123 Elm Street
<i>City:</i>	Choose a city in the state associated with the plan

² Issuers offering indemnity plan designs are not required to submit templates and supporting documents. However, they do need to complete the Network Adequacy section of the QHP Application.

<i>State:</i>	Choose the state associated with the plan
<i>County:</i>	Choose the county associated with the above-entered city
<i>ZIP:</i>	Enter 00000
<i>Network:</i>	Select one of the automatically created Network IDs.

If required, issuers must upload the ECP/Network Adequacy Template using the “**Upload ECP/Network Adequacy Files**” feature of the ECP/Network Adequacy section of the Issuer Module.

4.3 Supporting Documentation and Justification Instructions

If an issuer believes that its network may not meet network adequacy standards (e.g., it received a deficiency notification last year and nothing has changed) or it received a correction notice related to network adequacy this year, it has the option to submit a written justification.³ The written justification should include the following:

1. An explanation of how the issuer will provide reasonable access to healthcare providers in the county(ies) identified and any other considerations and information that the issuer believes is pertinent, such as applicable patterns of care, information about provider availability in the area, and applicable policies and procedures.
2. The explanation cited in number 1 should address each county/specialty combination specifically listed in the correction notice.
3. The issuer should state if it has received enrollee complaints about the lack of access to healthcare providers in the identified county(ies), and if so, the number of these complaints and an explanation of how the complaints were resolved.
4. An explanation of the current recruitment efforts in each county specifically listed in the correction notice.
5. An explanation of the applicable policy or pattern of care when in-network providers are not available and enrollees are required to use an out-of-network provider for treatment purposes.

The written explanation should be saved as a **PDF or Word file**. The file(s) can be uploaded as supporting documents by going to the ECP/Network Adequacy section of the Issuer Module and selecting **Document Type** in the **Uploaded Supplementary Documentation** section. Then click the **Browse** button to select the file and the **Upload** button to upload the supporting document(s).

When uploading justifications and/or other supporting documentation, the HIOS QHP Issuer Module will only upload file names with the following characters:

- All alphabet characters, A to Z (uppercase or lowercase)

³ Justifications can be submitted with the initial submission.

- All numbers, 0-9
- Underscore, _
- Short Dash, -
- Period, .

Any file names that include a space or special characters, such as “!” will not be supported.

For information on completing the ECP/Network Adequacy Template, please reference Chapter 18.