

# Instructions for the Plan ID Crosswalk Template

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## Contents

1. Overview.....	1
2. Key Updates to the Template	
3. Plan ID Crosswalk Template Submission Process .....	1
4. State Authorization of the Plan ID Crosswalk Template.....	4
5. Plan ID Crosswalk Template Data Requirements .....	4
6. Application Instructions.....	4
6.1 Template Instructions.....	7
7. Frequently Asked Questions.....	15

## 1. Overview

The Federally-facilitated Marketplace (FFM) Plan ID Crosswalk template crosswalks 2015 Qualified Health Plan (QHP) Plan ID and service area combinations (e.g., Plan ID and County combinations) to a 2016 QHP Plan ID. This data will facilitate 834 enrollment transactions from CMS to the issuer for those enrollees in the individual market who have not actively selected a different QHP during open enrollment.

This Plan ID Crosswalk template includes cases in the individual market where an issuer renews coverage, consistent with the guaranteed renewability standards under 45 CFR 147.106(e) and 155.335(j)(1). It also includes cases in the individual market where an issuer non-renews or discontinues coverage, or continues the product but no longer serves one or more enrollees, consistent with §147.106(c) and 155.335 (j)(2), and selects a plan under a different product offered by the issuer for those enrollees who do not make another plan selection. In all cases, issuers must comply with applicable federal and state law.

For plan year 2016, CMS has deferred the Federally-facilitated Small Business Health Options Program’s (FF-SHOP) ability auto renew employees. Therefore, issuers should not submit a Plan ID Crosswalk template for FF-SHOP plans.

For additional information or questions not answered by these instructions, please contact the QHP Application help desk at 855-CMS-1515 or via e-mail at [CMS\\_FEPS@cms.hhs.gov](mailto:CMS_FEPS@cms.hhs.gov).

## 2. Key Updates to the Template

Summary of key changes to the 2016 Plan ID Crosswalk template include:

- Textual changes throughout the template to update 2014 to 2015 and 2015 to 2016.
- Updates to Plans and Benefits template and Service Area data import functionality includes:

- Import completed 2015 templates rather than 2014 templates.
- Template will pre-populate basic issuer information from the import (State, Issuer ID, QHP/SADP, SHOP/Individual), but will NOT lock the cells for the user.
- Three additional template validations before issuer can create and submit the xml file. New additional validations include: (1) All Plan IDs (2015 and age off) are in proper format (5 digits, two letters, 7 digits); (2) The state is the same in all plans as it is at the top of the template; and (3) All 2015 Plan IDs have been crosswalked to a plan or to no enrollment option for 2016.

### 3. Plan ID Crosswalk Template Submission Process

This section provides an overview of the Plan ID Crosswalk template submission process including submission method. The submission process applies to all issuers that offered individual market QHPs through the FFM in 2015 – including issuers in states performing plan management functions in an FFM. This also includes issuers in State-Based Marketplaces (SBM) utilizing the federal platform for eligibility and enrollment services.

All issuers offering individual market QHPs, including stand-alone dental plans (SADPs), should submit one or more Plan ID Crosswalk templates as part of their QHP Certification application. All FFM issuers, including those in states performing plan management functions, should submit the Plan ID Crosswalk template to [QHP\\_Applications@cms.hhs.gov](mailto:QHP_Applications@cms.hhs.gov).<sup>1</sup> Issuers should make their Plan ID Crosswalk submissions following the timelines in Table 1 below. This timeline mirrors the dates in the 2016 Letter to Issuers.

CMS will conduct an overall data integrity review of submitted Plan ID Crosswalk data. This will include, but not be limited to, an evaluation for compliance with 45 C.F.R. 155.335(j).<sup>2</sup> This will also include a review for consistency with submitted Service Area and Plans and Benefits Template data for both 2015 and 2016. Note that issuers are subject to the standards under 45 CFR 156.290 when electing not to seek recertification with the Marketplace.

Issuers participating in the Multi-State Plan (MSP) Program are required to complete a separate template for their MSP options and follow a different submission process. OPM will contact MSP Program Issuers directly with these instructions.

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<sup>1</sup> This also includes issuers in State-Based Marketplaces (SBM) utilizing the federal platform for eligibility and enrollment services.

<sup>2</sup> Patient Protection and Affordable Care Act; Annual Eligibility Redeterminations for Exchange Participation and Insurance Affordability Programs; Final Rule, 79 Federal Register 52994 (September 5, 2014); codified at 45 C.F.R. parts 146, 147, 148, 155, and 156.

**Table 1: Key Dates for Submission of Plan ID Crosswalk Template**

Note: All dates are subject to change

Activity	Dates (Approximate)
Issuers submit Plan ID Crosswalk Template by 5/15 to <a href="mailto:QHP_Applications@cms.hhs.gov">QHP_Applications@cms.hhs.gov</a>	4/15/2015 – 5/15/2015
CMS reviews template for data integrity validations	5/18/2015 – 6/26/2015
CMS sends 1 <sup>st</sup> Plan ID Crosswalk Template notice highlighting data integrity errors	6/29/2015 – 6/30/2015
<ul style="list-style-type: none"> <li>• Issuers complete updated version of template to <a href="mailto:QHP_Applications@cms.hhs.gov">QHP_Applications@cms.hhs.gov</a></li> <li>• Issuer sends evidence from the state, such as an email confirmation, that the issuer is authorized to submit its Plan ID Crosswalk</li> </ul>	7/10/2015
CMS review of updated template for data integrity validations	7/13/2015 – 8/12/2015
CMS sends 2 <sup>nd</sup> Plan ID Crosswalk Template notice highlighting data integrity errors	08/13/2015 – 8/14/2015
<ul style="list-style-type: none"> <li>• Issuers complete updated version of template to <a href="mailto:QHP_Applications@cms.hhs.gov">QHP_Applications@cms.hhs.gov</a></li> <li>• Issuer sends evidence from the state, such as an email confirmation, that the issuer is authorized to submit its Plan ID Crosswalk</li> </ul>	8/25/2015

Issuers submitted Plan ID Crosswalk Template as of August 25, 2015 will be the data lock down date for issuers for this template. CMS will not be accepting updates from issuers after this date unless CMS or the state found errors with the template. CMS expects that issuers would not remove any 2016 plans seeking QHP certification that are listed in the submitted Plan ID Crosswalk Template after August 25, 2015.

#### 4. State Authorization of the Plan ID Crosswalk Template

Issuers are expected to submit evidence from the state, such as an email confirmation, that the issuer is authorized to submit its Plan ID Crosswalk. CMS will require this evidence to be submitted by issuers no later than July 10th. Any subsequent submission of an issuer's Plan ID Crosswalk made after July 10th should include an updated state authorization form.

States have the opportunity to review the Plan ID Crosswalk template for overall approval and for compliance with the Affordable Care Act market reforms such as uniform modification of coverage standards. States have flexibility to determine the exact method by which they will review the Plan ID Crosswalk template. For example, a state may:

- Instruct issuers that the State Department of Insurance expects issuers to complete the Plan ID Crosswalk template in compliance with state law and federal requirements (e.g., guaranteed renewability, uniform modification of coverage) and is consistent with the results of the state's form filing reviews.
- Perform more detailed review to confirm that the submitted Plan ID Crosswalk template is consistent with state and federal requirements and reflects what the state would have expected to see in relation to their form filing reviews.

CMS will not be sending Plan ID Crosswalk template to states. Issuers may be asked by their state regulators to provide this template in addition to their submission to CMS (e.g., include the template as part of the NAIC SERFF binder).

Issuers in Direct Enforcement states (Alabama, Missouri, Oklahoma, Texas, and Wyoming) should submit the authorization form to their state Department of Insurance and to CMS' Compliance and Enforcement Division ([formfiling@cms.hhs.gov](mailto:formfiling@cms.hhs.gov)) to obtain the necessary authorization for submission.

#### 5. Plan ID Crosswalk Template Data Requirements

To complete this section, you need the following information:

1. HIOS Issuer ID
2. Issuer State
3. Market Coverage
4. Completed and finalized **2015** Plans & Benefits Template and **2015** Service Area Template. These are the templates you submitted during the previous year's QHP certification cycle. ***Please note: The Plan ID Crosswalk template will only import a Plans & Benefits and Service Area Templates from 2015. The template will not allow you to import a Plans & Benefits and Service Area Template from any other plan year.***

#### 6. Application Instructions

The Plan ID Crosswalk template is an Excel template that allows issuers to indicate the 2016 Plan IDs that will be associated with their 2015 Plan IDs and associated service areas. Figure 1 gives an overview of the instructions for completing the Plan ID Crosswalk template.

All individual market issuers that offered coverage through the FFM in 2015 are expected to the Plan ID Crosswalk template and any required supporting documentation. Issuers should submit separate templates for the following markets:

- Individual market QHPs
- Individual market stand-alone dental plans (SADPs)
- Individual market Multi-State Plans (MSPs)

Issuers participating in the Multi-State Plan Program are expected to complete a separate template for their MSP options and follow a different submission process. OPM will contact MSP Program Issuers directly with these instructions.

When the template is completed, issuers must save the finalized XML file and email it to [QHP\\_Applications@cms.hhs.gov](mailto:QHP_Applications@cms.hhs.gov) with the subject title “2015 Plan ID Crosswalk”. Please note: If the XML file name is modified after finalization, CMS cannot process the template.

***Please note:*** CMS strongly encourages issuers to complete this template in Excel versions up to 2010. Due to a recent Microsoft Office Tools update, some Excel 2013 users may find the template’s buttons are not working upon opening the template. If you encounter this issue, the steps listed below to fix will direct you to delete some temporary files that Excel relies upon to execute macros associated with the buttons. Please note: these files are recreated every time you open excel and will not affect your computer’s operations in any way. If you open the template in Excel 2013 and find that the buttons are not working, take the following steps:

1. Close Excel.
2. Open Windows Explorer and select your local hard drive.
3. In the “Search” field, enter “.exd”
4. Delete all files with an .exd extension.
5. Reopen the template and the macro buttons should function properly.

Figure 1. Plan ID Crosswalk Template Highlights

- Download the latest version of the Plan ID Crosswalk template from the Center for Consumer Information and Insurance Oversight (CCIIO) website (<http://cciio.cms.gov/programs/exchanges/qhp.html>).
- To initiate the template to allow data entry, enable template macros using the **Options** button on the Security Warning toolbar, and select **Enable this content**.
- Import your finalized 2015 Plans & Benefits and 2015 Service Area Templates. You must import only one Plans & Benefits Template and one Service Area Template. Issuers must make separate submissions for their MSP and SADP Plans.
- Assign a “Crosswalk Level” to each Plan ID:
  - Crosswalking to same Plan ID
  - Crosswalking at the Plan ID level
  - Crosswalking at the Plan ID and county coverage level
  - Crosswalking at the zip level for one or more counties
  - Discontinue with no crosswalk
  - Plan withdrawn prior to certification
- If you selected “Crosswalking for one or more counties at the zip level,” select which counties you would like to crosswalk at the zip level from the pre-populated menu.
- Click on “Create ‘2016 Crosswalk Tab’.” This will generate the “2015 Plan Crosswalk” tab in which the user will enter the reason for the crosswalk and the 2016 HIOS Plan ID.
- Select the “Reason for Crosswalk” from the following options (note some options may not be available depending on “Crosswalk Level” selection):
  - Renewing exact same product/plan combination
  - Renewing product; renewal in a different plan within product
  - Continuing product; no plan available in the particular service area under that product; enrollment in a different product
  - Continuing product; no plan available in the particular service area under than product; no enrollment option
  - Discontinuing product; enrollment into a different product
  - Discontinuing product; no enrollment option
- Enter your 2016 HIOS Plan ID for each applicable row.
- Select “Yes” under “Is this 2015 Plan a Catastrophic or Child-Only Plan?” for any catastrophic or child-only plans being crosswalked.
- Enter the 2016 HIOS Plan ID for enrollees aging off of the child-only or catastrophic plan.
- Click on the “Validate” button on the “2015 Plan Crosswalk” tab. Address any data errors that appear.
- Review your completed template for accuracy (e.g., ensure all 2015 Plan IDs and Service Area combinations are accounted for).
- Click on the “Finalize” button on the “2015 Plan Crosswalk” tab.

## 6.1 Template Instructions

Follow the instructions below to complete the Plan ID Crosswalk. Figures 2 and 3 show a sample completed Plan ID Crosswalk template tabs.

**Figure 2. Completed Plan ID Crosswalk Template—2015 Plan Crosswalk Tab**

Issuer Information			Actions	
<b>HIOS Issuer ID*</b>	12345		<b>1. Import 2015 Plan and Benefits Template and Service Area Template</b> Please save your completed 2015 Plans and Benefits and Service Area Template to a folder on your harddrive. <input type="button" value="Import 2015 Plan and Benefits and Service Area Templates"/>	
<b>Issuer State*</b>	WY			
<b>Market Coverage*</b>	Individual			
<b>Multi-State Plan*</b>	No			
<b>Dental Only Plan*</b>	No		<b>2. Create "2016 Crosswalk Tab"</b> Create the "2016 Crosswalk Tab" based upon your entry below. <input type="button" value="Create '2016 Crosswalk Tab'"/>	
<b>2015 HIOS Plan ID (Standard Component)</b>	<b>Crosswalk Level</b>	<b>Counties Crosswalked at Zip Level</b>		
<b>Required</b>	<b>Required:</b> Indicate whether you would like to crosswalk your 2015 to 2016 Plan IDs at the plan, county or zip code level.	<b>Required:</b> If user indicates Crosswalked at the Zip Level for one or more counties.		
12345WY1231111	Crosswalking at the Plan ID level			
12345WY1233333	Crosswalking at the Plan ID level		<b>3. Validate Data</b> Validate information entered into all tabs. <b>Warning:</b> Depending on data size, validation may take several minutes. <input type="button" value="Validate"/>	
12345WY1234444	Crosswalking at the Plan ID level			
			<b>4. Finalize Template</b> Export Data to XML file. <input type="button" value="Finalize"/>	

Figure 3. Completed Plan ID Crosswalk Template—2016 Plan Crosswalk Tab

2015 HIOS Plan ID (Standard Component)	County Name	Service Area Zip Code(s)	Crosswalk Level	Reason for Crosswalk	CROSSWALK PLAN		2016 Plan ID for Enrollees Aging off Catastrophic or Child-Only Plan.	2015 Plan ID (Optional at State Discretion)		2016 Plan ID (Optional at State Discretion)		2016 Plan ID (Catastrophic or Child-Only) (Optional at State Discretion)	
					2016 HIOS Plan ID (Standard Component)	Is this Plan a Catastrophic or Child-Only Plan?		Associated Policy Form Number(s)	NAIC SERFF Tracking Number(s) for Form Filing(s)	Associated Policy Form Number(s)	NAIC SERFF Tracking Number(s) for Form Filing(s)	Associated Policy Form Number(s)	NAIC SERFF Tracking Number(s) for Form Filing(s)
Required	Required: Select the County - FPS this Service Area covers	Required if Partial County Coverage in 2015: Enter the zip codes in this county that are covered by this Service Area	Based on Option Selected on "2014 Plan Crosswalk" worksheet.	Required: Indicate whether the plan will be renewed to same plan, Crosswalked to similar plan under product, Crosswalked to similar plan under different product, or Product no longer available in Service Area.	Required	Required	Required if Yes Under "Is this Plan a Catastrophic or Child-Only Plan."	Associated Policy Form Number(s)	NAIC SERFF Tracking Number(s) for Form Filing(s)	Associated Policy Form Number(s)	NAIC SERFF Tracking Number(s) for Form Filing(s)	Associated Policy Form Number(s)	NAIC SERFF Tracking Number(s) for Form Filing(s)
12345WY1231111			Crosswalking at the Plan ID level	Renewing exact same product/plan combination (Different 2015 Plan ID)	12345WY1231112	No							
12345WY1233333			Crosswalking at the Plan ID level	Continuing product; no plan available in the particular service area under that product; enrollment in a different product	12345WY1246666	No							
12345WY1234444			Crosswalking at the Plan ID level	Discontinuing product; enrollment into a different product	12345WY1247777	No							

Complete the following required fields in the Plan ID Crosswalk template:

### 2015 Plan Crosswalk Tab

1. Enable template macros using the **Options** button on the Security Warning toolbar, and select **Enable this content**. If macros are not enabled before entering data, the template will not recognize your data and you will have to reenter it.
  
2. *Import 2015 Plans and Benefits and 2015 Service Area:* Click on the button in the upper right corner of the 2015 Plan Crosswalk tab. The template will prompt you to select your completed 2015 Plans & Benefits Template and 2015 Service Area Template. The Plans & Benefits and Service Area templates must be selected at the same time; therefore both templates should be saved in the same folder prior to importing. To select both files, click on one template, and then press the “Ctrl” button while clicking on the other and then click “Open.” You must select exactly one Plans & Benefits Template and one Service Area Template. ***In order to complete this crosswalk accurately, you must use the templates finalized for plan year 2015 and only select one of each template. The template will not allow you to import a Plans & Benefits and Service Area Template from any other plan year. If you are having trouble importing your templates, contact the CMS Helpdesk at [CMS FEPS@cms.hhs.gov](mailto:CMS_FEPS@cms.hhs.gov) and attach both templates you are trying to import.*** The template will validate the following:
  - a. The issuer has imported one 2015 Plans & Benefits template and one 2015 Service Area template.
  - b. Both imported Service Area and Plans & Benefits templates have the same Issuer ID and state.
  - c. The imported Plans & Benefits and Service Area templates are in Excel format.
  - d. Every Service Area ID in the Plans & Benefits imported template is accounted for in the Service Area template. If a plan does not have an associated 2015 service area, that Plan ID will not appear on the 2015 Plan Crosswalk Tab.

The template will populate a list of 2015 Plan IDs and their associated service areas on the “2015 Plan and Service Area Data” tab. Review this tab to ensure the data was accurately imported. After the 2015 plan and service area data has been imported, the 2015 Plan Crosswalk tab will be populated with all applicable issuer information as well as a row for each 2015 Plan ID.

3. *Confirm Issuer Pre-Populated Issuer Information:* Confirm that the template has accurately populated the following issuer information:
  - a. *HIOS Issuer ID* (required): Ensure the template has accurately populated your five-digit HIOS issuer ID
  - b. *Issuer State* (required): Ensure the template has accurately populated the state where you are offering coverage.

- c. *Market Coverage* (required): Ensure the template has accurately populated the Market Coverage from the drop down menu. Because the FF-SHOP Marketplace will not support employee auto re-enrollment for plan year 2016, please ensure you are only submitting Individual Market Plan ID Crosswalk templates.
  - d. *Dental Only* (required): Ensure the template accurately indicates whether this crosswalk template is for dental only plans. Choose from the following:
    - a. **Yes:** This Plan ID Crosswalk template is for stand-alone dental plans (SADP) only.
    - b. **No:** This Plan ID Crosswalk is for QHP plans.
4. *Multi-State Plan* (required). Choose from the dropdown to indicate whether this crosswalk template is for OPM Multi-State Plans or not. Choose from the following:
- a. **Yes:** This Plan ID Crosswalk is for the issuer's Multi-State Plans.
  - b. **No:** This Plan ID Crosswalk is for the issuer's non-Multi-State Plans.
5. *Crosswalk Level (Required)*: Select from the dropdown menu the level at which you would like to crosswalk your 2015 plan. Choose from the following:
- a. **Crosswalking to the Same Plan ID:** Select this option if you are crosswalking your 2015 plan to the same Plan ID for plan year 2016 and you have no service area changes.
  - b. **Crosswalking at the Plan ID Level:** Select this option if you have no service area changes but are using a different 2016 Plan ID to reflect the same plan.
  - c. **Crosswalking at the Plan ID and county coverage level:** Select this option if your service area changed for the upcoming year and you need to crosswalk your 2015 plan to two or more 2016 Plan IDs. Note if your 2015 plan covered the entire state, you will need to crosswalk the plan for every county in the state.
  - d. **Crosswalking at the zip level for one or more counties:** Select this option if your service area changed for the upcoming year and you need to crosswalk your 2015 plan to two or more 2016 Plan IDs for the same county. Selecting this option will require you to select the counties from the 2015 plan's service area that will be crosswalked at the zip code level. The remaining 2015 service area will be crosswalked at the county level. *Please note: CMS strongly discourages issuers crosswalking at this level unless absolutely necessary.*
  - e. **Discontinue with no crosswalk:** Select this option if you are discontinuing this 2015 plan with no re-enrollment option for its enrollees.
  - f. **Plan withdrawn prior to Certification:** Select this option if the 2015 plan was withdrawn from the Marketplace prior to certification and has no enrollment. Issuers should also select this option if the 2015 Plan ID listed on the template was not approved by the state or FFM to be offered on the Marketplace in 2015.

6. *Counties Crosswalked at Zip Level* (Required if “Crosswalking at the zip level for one or more counties” is selected): Select from the pop-up menu which counties in your 2015 plan’s service area will be crosswalked at the zip code level.

### 2016 Plan Crosswalk Tab

7. After selecting a Crosswalk level for each 2015 Plan ID, click on the “Create ‘2016 Crosswalk Tab.’” The template will generate the 2016 Plan Crosswalk Tab. The first four columns, “2015 HIOS Plan ID,” “County Name,” “Service Area Zip Codes,” and “Crosswalk Level” will be auto-populated based on your entries in the 2016 Plan Crosswalk Tab. If you decided to crosswalk at the Plan ID-County level for one or more plans, a row will appear for each county that plan covered in 2015. If the user decided to crosswalk at the zip level for specific counties covered by a 2015 plan, a row for each Plan ID-County-Zip code combination will appear.

Only click this button when you are sure the 2015 Plan Crosswalk tab is complete. If you want to make changes on this tab after the 2016 Plan Crosswalk tab is created, you will need to click the “Create ‘2016 Crosswalk Tab’” button again and start over on the 2016 Plan Crosswalk tab. Clicking the “Create ‘2016 Crosswalk Tab’” button will clear all data you have already entered on the 2016 Crosswalk tab, so copy and paste this information into a separate workbook if you want to save your previous work.

8. *Crosswalk Reason* (Required): Choose from the dropdown menu the reason for the crosswalk. The list of options will depend upon the Crosswalk Level selected. Table 2 lists the possible Crosswalk Reason entries for each Crosswalk Level:
  - a. **Renewing exact same product/plan combination (Same 2015 Plan ID):** Select this option if you are crosswalking this Plan ID/Service Area to the exact same HIOS PlanID. Under this option, the template will auto-populate the 2016 Plan ID field with your 2015 Plan ID. Issuers are expected to comply with the “same plan” standards as defined in 45 CFR § 144.103. Issuers should use the same HIOS Plan ID if the same plan was offered the previous plan year and remains available for the upcoming 2016 plan year.
  - b. **Renewing exact same product/plan combination (Different 2016 Plan ID):** Select this option if you are crosswalking this Plan ID/Service Area to the same product/plan combination but with a different 2016 Plan ID. Issuers are expected to comply with the “same plan” standards as defined in 45 CFR § 144.103. As state above, in most cases, issuers should use the same HIOS Plan ID if the same plan was offered the previous plan year and remains available for the upcoming 2016 plan year.

In the limited cases where an issuer is continuing the same plan but has a need to crosswalk to a different HIOS Plan ID, the issuer should seek guidance and approval from their State regulatory authority prior to submitting their crosswalk template to CMS. In the case of Multi-State Plan options, an issuer should contact the Office of Personnel Management for guidance and prior approval.

- c. **Renewing product; renewal in a different plan within product:** Select this option if you are renewing this product, but crosswalking this Plan ID/Service Area to a different plan within the product offered through the FFM. If you select this option, you must use the same product ID embedded in the plan's 2015 Plan ID.
  - d. **Continuing product; no plan available in the particular service area under that product; enrollment in a different product:** Select this option if you are continuing this product in 2016 but will no longer offer any plans in part of the service area covered by the product in 2015 and are crosswalking to a plan within a different product offered through the FFM. Select this reason for that portion of the service area that you no longer offer any plans under that product. If you select this option, you must crosswalk to a 2016 Plan ID with a different product ID from the 2015 Plan ID.
  - e. **Continuing product; no plan available in the particular service area under that product; no enrollment option:** Select this option if you are continuing this 2015 product, but there is no plan under this product available to crosswalk to for this plan/service area combination. Select this option as well if you are re-enrolling the consumer into the same product but into a plan offered outside the Marketplace. Selecting this option will disable the 2016 HIOS Plan ID field.
  - f. **Discontinuing product; enrollment into a different product:** Select this option if this 2015 product is discontinued for plan year 2016 and enrollees in this plan and associated service area will be re-enrolled in a plan under a different product offered through the FFM. Under this option, the entered 2016 HIOS Plan ID must have a different product ID and you may not enter the discontinued 2015 product ID for any other row under the 2016 HIOS Plan ID.
  - g. **Discontinuing product; no enrollment option:** Select this option if this 2015 product is discontinued for plan year 2016 and there is no enrollment option through the FFM for 2015 enrollees in this Plan ID/Service Area. Select this option as well if you are discontinuing the product but re-enrolling the consumer into a plan offered outside the Marketplace. Selecting this option will disable the 2016 HIOS Plan ID field. Under this option, you may not enter the discontinued 2015 product ID for any other row under the 2016 HIOS Plan ID.
9. *2016 HIOS Plan ID* (Required): Enter the 2016 HIOS Plan ID you would like to crosswalk your enrollees to for the row's 2015 Plan ID/Service Area. This field will be auto-populated when "Renewing exact same product/plan combination (Same 2015 Plan ID)" is chosen under the Crosswalk Reason field. This field will be disabled when "Discontinuing product; no enrollment option," "Continuing product; no plan available in the particular service area under than product; no enrollment option," is chosen under the Crosswalk Reason field. **Note: Only input 2016 HIOS Plan IDs for plans that will be offered through the Marketplace and are listed in your 2016 QHP Application. CMS will not accept any 2016 Plan IDs for plans only sold outside the Marketplace.**

Please crosswalk 2015 plans to 2016 plans in a manner that is consistent with all final market rules related to the definition of “plan,” Uniform Modification, Annual Eligibility Redeterminations, and Guaranteed Renewability under 45 CFR Parts 144, 147, 155 and 156.

Table 2 lists the Crosswalk Reason and 2016 HIOS Plan entry options for each Crosswalk Level

**Table 2: Crosswalk Level, Reason for Crosswalk, and 2016 Plan ID Entry Options**

Crosswalk Level	Crosswalk Reason	2016 HIOS Plan ID
Crosswalking to same Plan ID	Renewing exact same product/plan combination (Same 2015 Plan ID) ( <i>auto-populated</i> )	Template populates field with 2015 Plan ID. ( <i>auto-populated</i> )
Crosswalking at the Plan ID Level	Renewing exact same product/plan combination (Different 2016 Plan ID)	Different Plan ID
	Renewing product; renewal in a different plan within product	Plan ID with same Product ID as 2015 Plan ID
	Continuing product; no plan available in the particular service area under that product; enrollment in a different product	Plan ID with different Product ID from 2015 Plan ID.
	Discontinuing product; enrollment into a different product	Plan ID with different Product ID from 2015 Plan ID.
Crosswalking at the Plan ID and county coverage level	Renewing exact same product/plan combination (Same 2015 Plan ID)	Template populates field with 2015 Plan ID. ( <i>auto-populated</i> )
	Renewing exact same product/plan combination (Different 2016 Plan ID)	Different Plan ID
	Renewing product; renewal in a different plan within product	Plan ID with same Product ID as 2015 Plan ID.
	Continuing product; no plan available in the particular service area under that product; enrollment in a different product	Plan ID with different Product ID from 2015 Plan ID.
	Continuing product; no plan available in the particular service area under than product; no enrollment option	2016 HIOS Plan ID field is disabled. ( <i>auto-populated</i> )
	Discontinuing product; enrollment into a different product	Plan ID with different Product ID from 2015 Plan ID.
	Discontinuing product; no enrollment option.	2016 HIOS Plan ID field is disabled. ( <i>auto-populated</i> )
Crosswalking at the zip level for one or more counties	Renewing exact same product/plan combination (Same 2015 Plan ID)	Template populates field with 2015 Plan ID. ( <i>auto-populated</i> )
	Renewing exact same product/plan combination (Different 2016 Plan ID)	Different Plan ID
	Renewing product; renewal in a different plan within product	Plan ID with same Product ID as 2015 Plan ID.
	Continuing product; no plan available in the particular service area under that product; enrollment in a different product	Plan ID with different Product ID from 2015 Plan ID.
	Continuing product; no plan available in the particular service area under than product; no	2016 HIOS Plan ID field is disabled. ( <i>auto-populated</i> )

	enrollment option	
	Discontinuing product; no enrollment option.	2016 HIOS Plan ID field is disabled. <i>(auto-populated)</i>
	Discontinuing product; enrollment into a different product	Plan ID with different Product ID from 2015 Plan ID.
Discontinue with no crosswalk	Discontinuing product; no enrollment option.	2016 HIOS Plan ID field is disabled. <i>(auto-populated)</i>
	Continuing product; no plan available in the particular service area under than product; no enrollment option	2016 HIOS Plan ID field is disabled. <i>(auto-populated)</i>
Plan Withdrawn Prior to Certification	Plan Withdrawn Prior to Certification. No enrollment option. <i>(auto-populated)</i>	2016 HIOS Plan ID field is disabled. <i>(auto-populated)</i>

10. *Is this 2015 Plan a Catastrophic or Child-Only Plan? (Required)*: this field will default to “No.” Please select “Yes” for any Catastrophic or Child-Only Plan being crosswalked.

11. *2016 Plan ID for Enrollees Aging off Catastrophic or Child-Only Plan (Required for Catastrophic or Child-Only Plans)*. Upon selecting “Yes” in the previous column, this field will allow you to enter a 2016 HIOS Plan ID. Enrollees who no longer meet the criteria for continued eligibility in these plans will be crosswalked to the 2016 Plan ID entered in this field.

12. *Associated Policy Form Number(s) and NAIC SERFF Tracking Number(s) for Form Filing(s)*. CMS has included the following optional data fields to be completed if requested by an issuer’s state regulator:

- a. 2015 Plan ID - Associated Policy Form Number(s) and NAIC SERFF Tracking Number(s) for Form Filing(s).
- b. 2016 Plan ID - Associated Policy Form Number(s) and NAIC SERFF Tracking Number(s) for Form Filing(s).
- c. 2016 Plan ID (Catastrophic or Child-Only) - Associated Policy Form Number(s) and NAIC SERFF Tracking Number(s) for Form Filing(s).

These data fields will not be included in the XML generated files that an issuer will email to CMS. If a state would like to review the template, they may ask the issuer to complete these fields and send it to them (e.g., include the template Excel file as part of the NAIC SERFF binder.)

### Validation and Finalization

13. After completing the 2016 Plan Crosswalk Tab, return to the 2015 Plan Crosswalk Tab. Click on “Validate.” The template will review your data entry and inform the user of any validation errors.

14. Review your completed template for accuracy (e.g., all 2015 Plan IDs and Service Area combinations are accounted for). After successfully validating the template, click on the

“Finalize” button. The template will then generate an XML file. Save the XML file to your local computer drive and email it to CMS at QHP\_Applications@cms.hhs.gov with the subject title “2015 Plan ID Crosswalk”. Please note: If the XML file name is modified after finalization, CMS cannot process the template.

## 7. Frequently Asked Questions

**Question:** We didn’t offer any on-Exchange products during 2015. We are applying for QHP certification for 2016. Because we didn’t offer any 2015 plans do we have to complete the FFM Plan ID Crosswalk template?

**Answer:** The Federally-facilitated Marketplace (FFM) Plan ID Crosswalk template crosswalks 2015 QHP Plan ID and service area combinations to a 2016 QHP Plan ID. If you did not offer individual market plans through the FFM in 2015 then the Plan ID Crosswalk template does not need to be completed to CMS.

**Question:** How do I upload my Plans and Benefits and Service Area templates into the Plan ID Crosswalk template?

**Answer:** The Plans and Benefits and Service Area templates must be imported at the same time; therefore both templates should be saved in the same folder prior to importing. Please make sure you have saved your Plans and Benefits template in an .xlsm format and the Service Area template in an .xls format.

**Question:** Are SBM states required to use the Federal Plan ID crosswalk from 2015 to 2016 plans as FFM states do?

**Answer:** The Plan-ID Crosswalk Template is only required for issuers in FFM states including states performing plan management functions in an FFM. The template and submission to CMS is also required of issuers in State-Based Marketplaces (SBM) utilizing the federal platform for eligibility and enrollment services. Issuers in SBM states should reach out to their state exchange contacts to determine what 2015-2016 crosswalk documentation is required.

**Question:** After entering data on my 2016 Plan ID Crosswalk I’ve realized I made a mistake. Can I re-create the 2015 Crosswalk Tab and copy and paste the data I’ve entered?

**Answer:** Yes. Please note that clicking on the “Create 2016 Crosswalk Tab” will erase all user entries on the 2016 Crosswalk Tab. The user will be allowed to copy and paste entries into the 2016 Crosswalk tab, however entries under “Crosswalk Reason” must match exactly with one of the dropdown options.

**Question:** I noticed a county or zip code is not included in the pre-populated rows when I crosswalk a service area by county or zip. How can I account for this county or zip?

**Answer:** The user may manually enter a row at the bottom of the 2016 Crosswalk tab to account for any county or 5 digit zips not included in the pre-populated rows. Please be sure the entered “2015 HIOS Plan ID”, “County Name”, “Crosswalk Level” and other data fields are consistent with the other rows and data entry for this Plan.

**Question:** What validations does the template conduct when the user clicks on the “Validate” button?

**Answer:** The validations conducted by the template help ensure your Plan ID Crosswalk submission is complete and filled in correctly. These validations will include:

- No required field has been left blank. This includes any field that will always require entry (e.g. HIOS Issuer ID) as well as fields that require entry given another field’s value (e.g. If the value selected for “Crosswalk Level” is "Cross walking for one or more counties at the zip level" then the “Counties Crosswalked at Zip Level” field must not be empty.)
- All Plan IDs (2015 and age off) are in proper format (5 digits, two letters, 7 digits).
- The state is the same in all plans and matches the entry for state at the top of the 2015 Plan Crosswalk Tab.
- All 2015 Plan IDs are accounted for in the template.
- All entries in the “Crosswalk Reason” field must be compatible with the selected Crosswalk Level entries. See Table 2 for a list of available Crosswalk Reasons for each Crosswalk Level.
- All entries on shared fields in the 2015 Plan Crosswalk and 2016 Plan Crosswalk tab matches.
- The “County Name” field on the 2016 Plan Crosswalk tab must be blank if the entry for the “Crosswalk Level” field is one of the following:
  - Crosswalking to same Plan ID
  - Crosswalking at the Plan ID level
  - Discontinue with no crosswalk
- The “Service Area Zip Code” field on the 2016 Plan Crosswalk tab must be blank if the entry for the “Crosswalk Level” field is one of the following:
  - Crosswalking to same Plan ID
  - Crosswalking at the Plan ID level
  - Discontinue with no crosswalk
  - Crosswalking at the Plan ID and county coverage level
- The 2016 HIOS Plan ID must match the 2015 HIOS Plan ID when the user selects “Crosswalking to the same Plan ID” under “Crosswalk Level.”
- The 2016 HIOS Plan ID must be empty if the user has the following entries in the Crosswalk Reason field:
  - Continuing product; no plan available in the particular service area under that product; no enrollment option.

- Discontinuing product; no enrollment option.
- Plan Suppressed. No enrollment Option.

**Question:** What validations will be conducted as part of CMS’s data integrity checks?

**Answer:** CMS overall data integrity review will include but is not limited to an evaluation for compliance with the final rule on Annual Eligibility Redeterminations for Exchange Participation and Insurance Affordability Programs as finalized. More specifically, CMS will check issuer’s submissions for the following:

- All counties covered in 2015 plans’ service areas are accounted for in the crosswalk.
- All 2016 enrollment options for a 2015 plan are crosswalked to a valid 2016 plan that is offered in that county and is compatible (e.g. the plan has the same market type, etc.)
- The entries in the “Crosswalk Reason” field are consistent with the “2016 HIOS Plan ID” entry and that all Crosswalk Reason entries are accurate. For example, if the crosswalk reason is “Continuing product; no plan available in the particular service area under that product; enrollment in a different product,” CMS will validate that there really is no plan in the 2015 product available in that county, and that the 2016 crosswalk plan is in a different product.
- Every 2015 plan has been properly crosswalked to a 2016 plan consistent with all market rules related to the definition of “plan,” Uniform Modification, Annual Eligibility Redeterminations, and Guaranteed Renewability. CMS will check to make sure plans are crosswalked using the following hierarchy:
  - If the same Plan ID is available in 2016, the 2015 Plan ID should be crosswalked to the same Plan ID.
  - If the same Plan ID is not available, the 2015 plan should be crosswalked to a plan with the same metal level and Product ID.
  - If a plan with the same metal level and Product ID is not available for 2016, the 2015 plan should be crosswalked to a plan with the same Product ID and with a metal level that is either 1 level lower or higher than the 2015 plan’s metal level.
  - If a plan with the same Product ID and with a metal level that is either 1 level lower or higher than the 2015 plan is not available for 2016, the 2015 plan should be crosswalked to a plan with the same Product ID.
  - If a plan with the same Product ID is not available for 2016, the 2015 plan should be crosswalked to a plan with the same metal level.
  - If a plan with the same metal level is not available for 2016, the 2015 plan should be crosswalked to a plan with a metal level that is either 1 level lower or higher than the 2015 plan’s metal level.

- If a plan with a metal level that is either 1 level lower or higher than the 2014 plan is not available for 2016, the 2015 plan should be crosswalked to any available on-exchange plan.
- If no on-exchange plans are available for 2016, the plan can be crosswalked to an off-exchange plan.

Upon completion of CMS's data integrity review, issuers will receive notice of any errors found and will be asked to resubmit their revised template. Issuers who do not submit a Plan-ID Crosswalk Template will receive a notice as well prompting them to submit one.

**Question:** If a health insurance issuer elects to discontinue offering a product (as defined in 45 CFR 144.103) in the group or individual market, may the issuer auto-enroll individuals covered under that product into a product of another licensed issuer?

**Answer:** Generally, no. Section 2703(c) of the Public Health Service (PHS) Act and 45 CFR 147.106(c) provide that, in any case in which an issuer decides to discontinue offering a particular product offered in the group or individual market, that product may be discontinued by the issuer in accordance with applicable State law in the applicable market only if certain requirements are met. Among the requirements for product discontinuation is that the issuer must offer to each plan sponsor or individual provided that particular product the option to purchase, on a guaranteed availability basis, any other health insurance coverage offered by the issuer in that market. An issuer does not satisfy the requirement to offer other health insurance coverage currently being offered "by the issuer" if it auto-enrolls consumers into a product of another issuer that is separately licensed to engage in the business of insurance in a State.

The exception to the prohibition on auto-enrollment is for changes of ownership, as recognized by the State in which the issuer offers coverage. Pursuant to 45 CFR 156.330, when a QHP issuer that offers one or more QHPs in a Federally-facilitated Exchange undergoes a change of ownership as recognized by the State in which the issuer offers the QHP, the QHP issuer must notify HHS of the change, and provide the legal name and Taxpayer Identification Number (TIN) of the new owner and the effective date of the change at least 30 days prior to the effective date of the change of ownership. CMS, in consultation with the applicable State authority, will evaluate on a case by case basis whether auto-enrollment into the new owner's product is appropriate in a change of ownership situation. Issuers that are approved to auto-enroll into a product of another licensed issuer should be aware that the Federally-facilitated Marketplace (FFM) will assign new FFM-assigned Subscriber and Member IDs to impacted enrollees (such identifiers remain the same when the reenrollment is into the same issuer), and thus these renewals require that the new issuer send an effectuation transaction to the FFM.

Furthermore, nothing in the PHS Act or the regulations under the PHS Act prevents an issuer that elects to discontinue offering all health insurance coverage in a market (market withdrawal under 45 CFR 147.106(d)) from auto-enrolling affected individuals into a product of another licensed issuer, to the extent permitted by applicable State law.

Issuers are required to follow this guidance when completing the Plan ID Crosswalk template. As a reminder, this template will be used by the Federally-facilitated Marketplace (FFM) to automatically renew or re-enroll existing enrollees into 2016 coverage. As part of CMS' data integrity review of the Plan ID Crosswalk template, CMS will notify the issuer of any cases

where a 2015 QHP or SADP is crosswalked to a 2016 plan ID that uses a different issuer ID. In these cases, CMS will require evidence from the state, such as an email confirmation, that the issuer is permitted to crosswalk plans in this manner. This evidence must include specific justification for the plans in question (e.g., issuer has elected to discontinue offering all health insurance coverage in a market).

**Question:** Can the Plan ID Crosswalk template accommodate states' requests for Plan ID Crosswalk template submissions for Off-Exchange plans?

**Answer:** Because the Plan ID Crosswalk template is designed to facilitate auto-reenrollment transactions on the Federally-facilitated Marketplace, the template does not import off-Exchange plans from issuers' Plans & Benefits Template. Issuers should not submit Plan ID Crosswalk template for any off-Exchange plans to CMS. However, the steps below describe how an issuer could submit off-Exchange Plan IDs to the State if requested by their State regulator. In a separate template submission to their state, issuers may enter off-Exchange plan information into the Plan ID Crosswalk template manually. If your Plans & Benefits Template contains both on-Exchange and off-Exchange plans, then issuers may enter off-Exchange plans into the Plan ID Crosswalk by following these steps:

1. Import your 2015 Plans & Benefits Template following the Plan ID Crosswalk template instructions. The 2015 Plan Crosswalk tab will be populated with Plan IDs offered through the FFM but will not include any Off-Exchange Plans.
2. Enter crosswalk level information for the imported Plan IDs and create the 2016 Crosswalk tab.
3. On the 2016 Plan Crosswalk tab, enter your crosswalk information for the imported Plan IDs offered on the FFM. To enter crosswalk information for your off-Exchange Plan IDs, enter the information manually below your imported Plan ID information. Please make sure you only enter the allowable Crosswalk Level and Crosswalk Reason entries as indicated in the Plan ID Crosswalk instructions.
4. On the 2015 Plan Crosswalk tab, enter the Plan IDs and Crosswalk level entries for the Off-Exchange Plan IDs you manually entered onto the 2016 Plan Crosswalk tab. Make sure the Plan IDs and Crosswalk Level entries match across the two tabs.
5. Validate and finalize your template. ***Please note: Issuers should not submit to CMS a Plan ID Crosswalk Template for any "off-Exchange plans."***

If your Plans & Benefits Template does not contain any on-Exchange plans, you will need to manually enter your 2015 Plans onto the 2015 Crosswalk tab prior to creating the 2016 tab. To do this, follow these steps:

1. Enter your Issuer Level information in the upper left hand corner of the 2015 Crosswalk tab (e.g. Issuer ID, Issuer state).
2. Enter all of your 2015 Plan IDs on the 2015 Plan Crosswalk tab.

3. Enter a Crosswalk Level for each Plan ID. You must enter “Crosswalking to same Plan ID” or “Crosswalking at the Plan ID Level” for this field. You will be able to change these entries after you have created the 2016 Plan Crosswalk tab.
4. Click on “Create 2016” tab and manually edit your crosswalk information for all of your 2015 plans.
5. Edit the 2015 Plan Crosswalk tab to make your Crosswalk Level entries consistent between your 2015 and 2016 Crosswalk tab in order to pass the template’s validations.
6. Validate and finalize your template. ***Please note: Issuers should not submit to CMS a Plan ID Crosswalk Template for any “off-Exchange plans.”***