Instructions for the Plan ID Crosswalk Template

Contents

1. Overview

The Federally-facilitated Marketplace (FFM) Plan ID Crosswalk Template crosswalks 2016 Qualified Health Plan (QHP) standard component ID and service area combinations (such as Plan ID and county combinations) to a 2017 QHP Plan ID. These data will facilitate 834 enrollment transactions from the Centers for Medicare & Medicaid Services (CMS) to the issuer for enrollees in the individual market who have not 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 *Code of Federal Regulations* (CFR) 147.106(e) and 155.335(j)(1). It also includes cases in the individual market where an issuer does not renew or discontinues coverage, or continues the product but no longer serves one or more enrollees due to a change in service area, consistent with 147.106(c) and 155.335 (j)(2), and selects a plan under a different product offered by the issuer for enrollees who do not make another plan selection. In all cases, issuers must comply with applicable federal and state law. First-time QHP issuers are not expected to submit a Plan ID Crosswalk Template.

For plan year 2017, CMS has deferred the Federally-facilitated Small Business Health Options Program's (FF-SHOP's) ability to auto-renew employees. Therefore, issuers should not attempt to 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.

2. Key Updates to the Template

Key changes to the 2017 Plan ID Crosswalk Template include the following:

- Updates to the Plans & Benefits Template and Service Area data import functionality, such as

  o importing completed 2016 templates, and

  o pre-populating basic issuer information from the import (State, Issuer ID, QHPs, stand-alone dental plans (SADPs), and Small Business Health Options Program (SHOP)/Individual), but NOT locking the cells for the user.

- A new "Reason for Crosswalk" entry for scenarios where a silver plan is being crosswalked to another silver plan in a different product.

3. Plan ID Crosswalk Template Submission Process

This section provides an overview of the Plan ID Crosswalk Template submission process, including the submission method. The submission process applies to all issuers that offered individual market QHPs through the FFM in 2016—including those in states performing plan management functions in an FFM. This also includes issuers in State-Based Marketplaces (SBMs) using the federal platform for eligibility and enrollment services.

All issuers offering individual market QHPs, including SADPs, should submit one or more Plan ID Crosswalk Templates as part of their QHP 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.[1] Issuers should make their submissions following the timelines in Table 1, which mirrors the dates in the 2017 Letter to Issuers.

CMS will review the overall data integrity of submitted Plan ID Crosswalk data, evaluating them for compliance with 45 CFR 155.335(j).[2] It will also review these data for consistency with submitted Service Area and Plans & Benefits Template data for both 2016 and 2017. 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. The Office of Personnel Management (OPM) will contact MSP Program issuers directly with these instructions.

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[1] This includes issuers in SBMs that use the federal platform for eligibility and enrollment services.
[2] 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 CFR parts 146, 147, 148, 155, and 156.

Table 1. Key Dates for Submission of Plan ID Crosswalk Template

Activity	Dates (approximate)
Issuers submit Plan ID Crosswalk Template to QHP_Applications@cms.hhs.gov.	4/11–5/11/2016
CMS reviews template for data integrity validations.	5/12–6/10/2016
CMS sends first Plan ID Crosswalk Template notice to issuers, highlighting data integrity errors.	6/15–6/16/2016
• Issuers complete updated version of template and send it to QHP_Applications@cms.hhs.gov. • Issuer sends evidence from state, such as e-mail confirmation, that issuer is authorized to submit its Plan ID Crosswalk Template.	6/30/2016
CMS reviews updated template for data integrity validations.	7/01–8/02/2016
CMS sends second Plan ID Crosswalk Template notice to issuers, highlighting data integrity errors.	8/08–8/09/2016
• Issuers complete updated version of template and send it to QHP_Applications@cms.hhs.gov. • Issuer sends evidence from state, such as e-mail confirmation, that issuer is authorized to submit its Plan ID Crosswalk Template.	8/23/2016

Note: All dates are subject to change.

August 23, 2016 will be the data lockdown date for issuers for the Plan ID Crosswalk Template. CMS will not accept updates from issuers after this date unless CMS or the state found errors with the template. CMS expects issuers not to remove any 2017 plans seeking QHP certification that are listed in the submitted Plan ID Crosswalk Template after August 23, 2016.

4. State Authorization of the Plan ID Crosswalk Template

Issuers are expected to submit evidence from the state, such as an e-mail confirmation, that the issuer is authorized to submit its Plan ID Crosswalk Template. CMS will require this evidence to be submitted by issuers no later than June 30. Any subsequent submission of an issuer's Plan ID Crosswalk after June 30 should include an updated state authorization form. Issuers should send evidence of state authorization to QHPApplications@cms.hhs.gov.

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 the flexibility to determine the exact method by which they will review the Plan ID Crosswalk Template. For example, a state may do the following:

- 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 (such as guaranteed renewability and uniform modification of coverage) and consistent with the results of the state's form filing reviews.

- Review the submitted Plan ID Crosswalk Template in more detail to confirm it is consistent with state and federal requirements and reflects what the state would have expected to see in relation to its 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, for example, including the template as part of the National Association of Insurance Commissioners (NAIC) System for Electronic Rate and Form Filing (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 the CMS Compliance and Enforcement Division (formfiling@cms.hhs.gov) to obtain the necessary authorization for submission.

5. Plan ID Crosswalk Template Data Requirements

To complete the template, you need the following information:

1. Health Insurance Oversight System (HIOS) issuer ID

2. Issuer state

3. Market coverage

4. A completed and finalized **2016** Plans & Benefits Template and **2016** Service Area Template. These are the templates you submitted during the previous year's QHP certification cycle. *The Plan ID Crosswalk Template will only import Plans & Benefits and Service Area Templates from 2016. The template will not allow you to import a Plans & Benefits or 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 2017 Plan IDs and service areas that will be associated with their 2016 Plan IDs and associated service areas.

All individual market issuers that offered coverage through the FFM in 2016 are expected to submit the Plan ID Crosswalk Template and any required supporting documentation, even if they are not seeking recertification in plan year 2017. Issuers should submit separate templates for the following markets:

- Individual market QHPs

- Individual market SADPs

- Individual market MSPs.

Issuers participating in the MSP 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 e-mail it to QHP_Applications@cms.hhs.gov with the subject title "2017 Plan ID Crosswalk". If the XML file name is modified after finalization, CMS cannot process the template.

Figure 1 shows key items in these instructions for completing the Plan ID Crosswalk Template.

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 and allow data entry, enable the template macros using the **Options** button on the Security Warning toolbar, and select **Enable this content**.

- Import your finalized 2016 Plans & Benefits and 2016 Service Area Templates. You must import only one Plans & Benefits Template and one Service Area Template. You must make separate submissions for 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 at the ZIP level for one or more counties," select which counties you would like to crosswalk at the ZIP level from the pre-populated menu.

- Click **Create 2017 Crosswalk Tab**. This will generate the **2017 Plan Crosswalk** tab for entering the reason for the crosswalk and the 2017 HIOS Plan ID.

- Select the *Reason for Crosswalk* from the following options (some 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 that product; no enrollment option
  - Continuing product; no silver plan available in the particular service area under that product, enrollment in a silver plan under a different product
  - Discontinuing product; enrollment into a different product
  - Discontinuing product; no enrollment option.

- Enter your 2017 HIOS Plan ID for each applicable row.

- Select **Yes** under *Is this 2016 Plan a Catastrophic or Child-Only Plan?* for any catastrophic or child-only plans being crosswalked.

- Enter the 2017 HIOS Plan ID for enrollees aging off of the child-only or catastrophic plan.

- Click the **Validate** button on the **2016 Plan Crosswalk** tab. Address any data errors that appear.

- Review your completed template for accuracy (including ensuring all 2016 Plan IDs and Service Area combinations are accounted for).

- Click the **Finalize** button on the **2016 Plan Crosswalk** tab.

6.1 Template Instructions

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

Figure 2. Completed Plan ID Crosswalk Template—2016 Plan Crosswalk Tab

Plan Crosswalk Template 2.0.4

Issuer Information

HIOS Issuer ID*	12345
Issuer State*	AK
Market Coverage*	Individual
Dental Only Plan*	Yes
Multi-State Plan*	No

2016 HIOS Plan ID (Standard Component)	Crosswalk Level	Counties Crosswalked at Zip Level
Required	Required: Indicate whether you would like to crosswalk your 2016 to 2017 Plan IDs at the plan, county or zip code level.	Required if user indicates Crosswalked at the Zip Level for one or more counties.
12345AK0010001	Crosswalking to same Plan ID	
12345AK0010002	Crosswalking at the plan ID level	
12345AK0010003	Crosswalking at the Plan ID and county coverage level	

Actions

1. **Import 2016 Plan and Benefits Template and Service Area Template**
   Please save your completed 2016 Plans and Benefits and Service Area Template to a folder on your harddrive.
   [Import 2016 Plan and Benefits and Service Area Templates]

2. **Create "2017 Crosswalk Tab"**
   Create the "2017 Crosswalk Tab" based upon your entry below.
   [Create "2017 Crosswalk Tab"]

3. **Validate Data**
   Validate information entered into all tabs. Warning: Depending on data size, validation may take several minutes.
   [Validate]

4. **Finalize Template**
   Export Data to XML file.
   [Finalize]

Figure 3. Completed Plan ID Crosswalk Template—2017 Plan Crosswalk Tab

2016 HIOS PlanID (Standard Component)	County Name	Service Area Zip Code(s)	Crosswalk Level	Reason for Crosswalk	CROSSWALK PLAN 2017 HIOS PlanID (Standard Component)	Is this Plan a Catastrophic or Child-Only Plan?	2017 Plan ID for Enrollees Aging off Catastrophic or Child-Only Plan.	2016 Plan ID (Optional at State Discretion)		2017 Plan ID (Optional at State Discretion)		2017 Plan ID (Catastrophic or Child-Only) (Optional at State Discretion)	
Required	Required if crosswalking at county or zip level	Required if crosswalking at the zip level	Based on Option Selected on "2016 Plan Crosswalk" Worksheet	Required	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)
12345AK0010001			Crosswalking to same Plan ID	Renewing exact same product/plan combination (Same 2016 Plan ID)	12345AK0010001	No							
12345AK0010002			Crosswalking at the plan ID level	Renewing product; renewal in a different plan within the product	12345AK0010004	No							
12345AK0010003			Crosswalking at the plan ID level	Discontinuing product; enrollment into a different product	12345AK0020001	No							

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

6.1.2 2016 Plan Crosswalk Tab

1. *Enable Template Macros:* 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 2016 Plans & Benefits and 2016 Service Area*. Click the button in the upper right corner of the **2016 Plan Crosswalk** tab. The template will prompt you to select your completed 2016 Plans & Benefits Template and 2016 Service Area Template. The Plans & Benefits and Service Area Templates must be selected at the same time, so both templates should be saved in the same folder before importing. To select both files, click one template, and then press the **Ctrl** button while clicking the other, and then click **Open**. You must select exactly one Plans & Benefits Template and one Service Area Template.

   To complete this crosswalk accurately, you must use the templates finalized for plan year 2016 and only select one of each template. The template will not allow you to import a Plans & Benefits Template or a 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 and attach both templates you are trying to import.

   The template validates the following:

   a. The issuer has imported one 2016 Plans & Benefits Template and one 2016 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 Template is accounted for in the Service Area Template. If a plan does not have an associated 2016 service area, that Plan ID will not appear on the **2016 Plan Crosswalk** tab.

   The template populates a list of 2016 Plan IDs and their associated service areas on the **2016 Plan and Service Area Data** tab. Review this tab to ensure the data were accurately imported. After the 2016 plan and service area data have been imported, the **2016 Plan Crosswalk** tab will be populated with all applicable issuer information as well as a row for each 2016 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. The FF-SHOP Marketplace does not allow auto-renewals for plan year 2017. For this reason, this field is hard-coded to Individual.

d. *Dental Only* (required*)*. Ensure the template accurately indicates whether this crosswalk template is for dental only plans. Choose from the following:

    i. **Yes**—This Plan ID Crosswalk Template is for SADPs only.

    ii. **No**—This Plan ID Crosswalk is for QHP plans.

4. *Multi-State Plan* (required). Choose from the drop-down to indicate whether this crosswalk template is for OPM MSPs or not. Choose from the following:

a. **Yes**—This Plan ID Crosswalk is for the issuer's MSPs.

b. **No**—This Plan ID Crosswalk is for the issuer's non-MSPs.

5. *Crosswalk Level* (required). From the drop-down menu, select the level at which you would like to crosswalk your 2016 plan. Choose from the following:

a. **Crosswalking to the Same Plan ID.** Select this option if you are crosswalking your 2016 plan to the same Plan ID for plan year 2017 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 2017 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 2016 plan to two or more 2017 Plan IDs. (If your 2016 plan covered the entire state, you 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 2016 plan to two or more 2017 Plan IDs for the same county. Selecting this option will require you to select the counties from the 2016 plan's service area that will be crosswalked at the ZIP code level. The remaining 2016 service area will be crosswalked at the county level.

    CMS strongly discourages issuers crosswalking at this level unless absolutely necessary.

e. **Discontinue with no crosswalk.** Select this option if you are discontinuing this 2016 plan with no reenrollment option for its enrollees.

f. **Plan withdrawn prior to certification.** Select this option if the 2016 plan was withdrawn from the Marketplace prior to certification and has no enrollment. Issuers should also select this option if the 2016 Plan ID listed on the template was not approved by the state or FFM to be offered on the Marketplace in 2016.

6. *Counties Crosswalked at ZIP Level* (required if "Crosswalking at the ZIP level for one or more counties" is selected). From the pop-up menu, select the counties in your 2016 plan's service area to be crosswalked at the ZIP code level.

6.1.3 Plan Crosswalk Tab

1. After selecting a Crosswalk Level for each 2016 Plan ID, click **Create 2017 Crosswalk Tab**. The template will generate the **2017 Plan Crosswalk** tab. The first four columns, *2016 HIOS Plan ID*, *County Name*, *Service Area Zip Codes*, and *Crosswalk Level* will be auto-populated from your entries in the **2017 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 2016. If you decided to crosswalk at the ZIP code level for specific counties covered by a 2016 plan, a row for each Plan ID–county–ZIP code combination will appear.

    Only click this button when you are sure the **2016 Plan Crosswalk** tab is complete. If you want to make changes on this tab after the 2017 Plan Crosswalk tab is created, you will need to click the **Create 2017 Crosswalk Tab** button again and start over on the 2017 Plan Crosswalk tab. Clicking the **Create 2017 Crosswalk Tab** button will clear all data you have already entered on the **2017 Plan Crosswalk** tab, so copy and paste this information into a separate workbook if you want to save your previous work.

2. *Crosswalk Reason* (required). Choose from the drop-down menu the reason for the crosswalk. The list of options depends 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 2016 Plan ID).** Select this option if you are crosswalking this Plan ID/Service Area to the same HIOS Plan ID. Under this option, the template will auto-populate the 2017 Plan ID field with your 2016 Plan ID. Issuers are expected to comply with the "same plan" standards 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 2017 plan year.

    b. **Renewing exact same product/plan combination (Different 2017 Plan ID).** Select this option if you are crosswalking this Plan ID/Service Area to the same product/plan combination but with a different 2017 Plan ID. Issuers are expected to comply with the "same plan" standards defined in 45 CFR 144.103. As stated 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 2017 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 its state regulatory authority before submitting its Plan ID Crosswalk Template

to CMS. In the case of MSP options, an issuer should contact OPM 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 2016 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 2017 but will no longer offer any plans in part of the service area covered by the product in 2016 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 2017 Plan ID with a different product ID from the 2016 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 2016 product, but no plan under this product is 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 *HIOS Plan ID* field.

    f. **Continuing product; no silver plan available in the particular service area under that product, enrollment in a silver plan under a different product.** Select this option if no silver plan is available within the enrollee's product in a particular service area and the enrollee is being enrolled in a silver plan within another product.

    g. **Discontinuing product; enrollment into a different product.** Select this option if this 2016 product is discontinued for plan year 2017 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 2017 Plan ID must have a different product ID and you may not enter the discontinued 2016 product ID for any other row under the 2017 *Plan ID*.

    h. **Discontinuing product; no enrollment option.** Select this option if this 2016 product is discontinued for plan year 2017 and there is no enrollment option through the FFM for 2016 enrollees in this Plan ID/Service Area combination. 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 2017 *Plan ID* field. Under this option, you may not enter the discontinued 2016 product ID for any other row under the 2017 *Plan ID.*

3. *2017 HIOS Plan ID* (required). Enter the 2017 Plan ID you would like to crosswalk your enrollees to for the row's 2016 Plan ID/Service Area. This field will be auto-populated when "Renewing exact same product/plan combination (Same 2016 Plan ID)" is chosen under the *Crosswalk Reason* field. This field will be disabled when "Discontinuing product; no enrollment option" or "Continuing product; no plan available in the particular

service area under than product; no enrollment option" is chosen under the *Crosswalk Reason* field.

Only input 2017 Plan IDs for plans that will be offered through the Marketplace and are listed in your 2017 QHP Application. CMS will not accept any 2017 Plan IDs for plans only sold outside the Marketplace.

Please crosswalk 2016 plans to 2017 plans in a manner 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 2017 Plan ID entry options for each Crosswalk Level.

Table 2. Crosswalk Level, Reason for Crosswalk, and 2017 Plan ID Entry Options

Crosswalk level	Crosswalk reason	2017 HIOS Plan ID
Crosswalking to same Plan ID	Renewing exact same product/plan combination (Same 2016 Plan ID) *(auto-populated)*	Template populates field with 2016 Plan ID *(auto-populated)*
Crosswalking at the Plan ID Level	Renewing exact same product/plan combination (Different 2017 Plan ID)	Different Plan ID
	Renewing product; renewal in a different plan within product	Plan ID with same Product ID as 2016 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 2016 Plan ID
	Continuing product; no silver plan available in the particular service area under that product, enrollment in a silver plan under a different product	Plan ID with different product ID from 2017 Plan ID
	Discontinuing product; enrollment into a different product	Plan ID with different Product ID from 2016 Plan ID
Crosswalking at the Plan ID and county coverage level	Renewing exact same product/plan combination (Same 2016 Plan ID)	Template populates field with 2016 Plan ID *(auto-populated)*
	Renewing exact same product/plan combination (Different 2017 Plan ID)	Different Plan ID
	Renewing product; renewal in a different plan within product	Plan ID with same Product ID as 2016 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 2016 Plan ID
	Continuing product; no silver plan available in the particular service area under that product, enrollment in a silver plan under a different product	Plan ID with different product ID from 2017 Plan ID
	Continuing product; no plan available in the particular service area under than product; no enrollment option	2017 HIOS Plan ID field is disabled *(auto-populated)*

Crosswalk level	Crosswalk reason	2017 HIOS Plan ID
	Discontinuing product; enrollment into a different product	Plan ID with different Product ID from 2016 Plan ID
	Discontinuing product; no enrollment option	2017 HIOS Plan ID field is disabled *(auto-populated)*
Crosswalking at the ZIP level for one or more counties	Renewing exact same product/plan combination (Same 2016 Plan ID)	Template populates field with 2016 Plan ID *(auto-populated)*
	Renewing exact same product/plan combination (Different 2017 Plan ID)	Different Plan ID
	Renewing product; renewal in a different plan within product	Plan ID with same Product ID as 2016 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 2016 Plan ID
	Continuing product; no plan available in the particular service area under than product; no enrollment option	2017 HIOS Plan ID field is disabled (auto-populated)
	Continuing product; no silver plan available in the particular service area under that product, enrollment in a silver plan under a different product	Plan ID with different product ID from 2017 Plan ID
	Discontinuing product; no enrollment option.	2017 HIOS Plan ID field is disabled *(auto-populated)*
	Discontinuing product; enrollment into a different product	Plan ID with different Product ID from 2016 Plan ID
Discontinue with no crosswalk	Discontinuing product; no enrollment option.	2017 HIOS Plan ID field is disabled *(auto-populated)*
	Continuing product; no plan available in the particular service area under than product; no enrollment option	2017 HIOS Plan ID field is disabled *(auto-populated)*
Plan withdrawn prior to certification	Plan withdrawn prior to certification. No enrollment option *(auto-populated)*	2017 HIOS Plan ID field is disabled *(auto-populated)*

4. *Is this 2016 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.

5. *2017 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 2017 Plan ID. Enrollees who no longer meet the criteria for continued eligibility in these plans will be crosswalked to the 2017 Plan ID entered in this field.

6. *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. **2016 Plan ID**—Associated Policy Form Number(s) and NAIC SERFF Tracking Number(s) for Form Filing(s).

b. **2017 Plan ID**—Associated Policy Form Number(s) and NAIC SERFF Tracking Number(s) for Form Filing(s).

c. **2017 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 e-mails to CMS. If a state would like to review the template, it may ask the issuer to complete these fields and send it to them (for example, include the template Excel file as part of the NAIC SERFF binder.)

6.1.4 Validation and Finalization

1. After completing the **2017 Plan Crosswalk** tab, return to the **2016 Plan Crosswalk** tab. Click **Validate**. The template will review your data entry and inform you of any validation errors.

2. Review your completed template for accuracy (ensuring all 2016 Plan IDs and Service Area combinations are accounted for). After successfully validating the template, click the **Finalize** button. The template will then generate an XML file. Save the XML file to your local computer drive and e-mail it to CMS at QHP_Applications@cms.hhs.gov with the subject title "2016 Plan ID Crosswalk." (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 2016. We are applying for QHP certification for 2017. Because we didn't offer any 2016 plans, do we have to complete the FFM Plan ID Crosswalk Template?

Answer. The FFM Plan ID Crosswalk Template crosswalks 2016 QHP Plan ID and service area combinations to a 2017 QHP Plan ID. If you did not offer individual market plans through the FFM in 2016, you do not need to complete the Plan ID Crosswalk Template or submit it to CMS.

Question. How do I import my Plans & Benefits and Service Area Templates into the Plan ID Crosswalk Template?

Answer. The Plans & Benefits and Service Area Templates must be imported at the same time, so both templates should be saved in the same folder before importing. Ensure you have saved your Plans & Benefits Template in an .xlsm format and the Service Area Template in an .xls format.

Question. Are issuers in SBM states required to complete and submit their Plan ID Crosswalk Template for 2016 to 2017 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 are also required of issuers in SBMs using the federal platform for eligibility and enrollment

services. Issuers in SBM states should reach out to their state exchange contacts to determine the 2016–17 crosswalk documentation required.

Question: After entering data on my 2017 Plan ID Crosswalk, I realized I made a mistake. Can I re-create the **2016 Plan Crosswalk** tab and copy and paste the data I've entered?

Answer: Yes. Please note that clicking the **Create 2017 Crosswalk Tab** will erase all user entries on the 2017 Crosswalk Tab. You will be allowed to copy and paste entries into the **2017 Plan Crosswalk** tab, but the entries under *Crosswalk Reason* must match one of the drop-down 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 code. How can I account for this county or ZIP code?

Answer: The user may manually enter a row at the bottom of the **2017 Plan Crosswalk** tab to account for any county or five-digit ZIP codes not included in the pre-populated rows. (Ensure the entered *2016 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 Template is complete and filled in correctly. These validations include the following:

- No required field has been left blank. This includes any field that requires entry (such as *HIOS Issuer ID*) as well as those that require entry given another field's value (for example, if the value selected for *Crosswalk Level* is "Crosswalking for one or more counties at the ZIP level", the *Counties Crosswalked at ZIP Level* field must not be empty).

- All Plan IDs (2016 and age off) are in proper format (five digits, two letters, seven digits).

- The state is the same in all plans and matches the entry for state at the top of the **2016 Plan Crosswalk** tab.

- All 2016 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 **2016 Plan Crosswalk** tab and **2017 Plan Crosswalk** tab match.

- The *County Name* field on the **2017 Plan Crosswalk** tab must be blank if the entry for the *Crosswalk Level* field is one of the following:
  o Crosswalking to same Plan ID

- o Crosswalking at the Plan ID level

- o Discontinue with no crosswalk.

- The *Service Area ZIP Code* field on the **2017 Plan Crosswalk** tab must be blank if the entry for the *Crosswalk Level* field is one of the following:

  - o Crosswalking to same Plan ID

  - o Crosswalking at the Plan ID level

  - o Discontinue with no crosswalk

  - o Crosswalking at the Plan ID and county coverage level.

- The *2017 HIOS Plan ID* must match the *2016 HIOS Plan ID* when the user selects "Crosswalking to the same Plan ID" under *Crosswalk Level*.

- The *2017 HIOS Plan ID* must be empty if the user has the following entries in the *Crosswalk Reason* field:

  - o Continuing product; no plan available in the particular service area under that product; no enrollment option

  - o Discontinuing product; no enrollment option

  - o Plan suppressed. No enrollment option.

Question. What validations will be conducted as part of CMS's data integrity checks?

Answer. The overall data integrity review includes evaluating compliance with the final rule on Annual Eligibility Redeterminations for Exchange Participation and Insurance Affordability Programs as finalized. More specifically, CMS will check issuers' submissions for the following:

- All counties covered in 2016 plans' service areas are accounted for in the crosswalk.

- All 2017 enrollment options for a 2016 plan are crosswalked to a valid 2017 plan that is offered in that county and is compatible (it has the same market type, etc.).

- The entries in the *Crosswalk Reason* field are consistent with the *2017 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 2016 product available in that county and that the 2017 crosswalk plan is in a different product.

- Every 2016 plan has been properly crosswalked to a 2017 plan consistent with all market rules related to the definition of "plan," Uniform Modification, Annual Eligibility Redeterminations, and Guaranteed Renewability. CMS will ensure plans are crosswalked using the following hierarchy:

  - o If the same Plan ID is available in 2017, the 2016 Plan ID should be crosswalked to the same Plan ID.

o If the same Plan ID is not available, the 2016 plan should be crosswalked to a plan with the same metal level and Product ID.

o If the 2016 plan is a silver plan and another silver plan is not available in the current product for 2017, the 2016 silver plan should be crosswalked to a silver plan under a different product offered by the same issuer that is the most similar to the enrollee's current product. If no such silver plan is available for enrollment through the Exchange, the 2016 silver plan should be crosswalked to a plan that is one metal level higher or lower than the enrollee's current QHP under the same product.

o If the 2016 plan is not a silver plan and a plan with the same metal level and Product ID is not available for 2017, the 2016 plan should be crosswalked to a plan with the same Product ID and with a metal level one level lower or higher than the 2016 plan's metal level.

o If a plan with the same Product ID and with a metal level that is one level lower or higher than the 2016 plan is not available for 2017, the 2016 plan should be crosswalked to a plan with the same Product ID.

o If a plan with the same Product ID is not available for 2017, the 2016 plan should be crosswalked to a plan with the same metal level.

o If a plan with the same metal level is not available for 2017, the 2016 plan should be crosswalked to a plan with a metal level that is one level lower or higher than the 2016 plan's metal level.

o If a plan with a metal level that is one level lower or higher than the 2015 plan is not available for 2017, the 2016 plan should be crosswalked to any available on-Exchange plan.

o If no on-Exchange plans are available for 2017, 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 an FFM undergoes a change of ownership as recognized by the state in which the issuer offers the QHP, the QHP issuer must notify the Department of Health and Human Services 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 before the effective date of the change of ownership. CMS, in consultation with the applicable state authority, will evaluate case by case whether auto-enrollment into the new owner's product is appropriate in a change of ownership situation. Issuers approved to auto-enroll into a product of another licensed issuer should be aware that the FFM will assign new FFM-assigned Subscriber and Member IDs to impacted enrollees (such identifiers remain the same when the re-enrollment is with the same issuer); 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 FFM to automatically renew or re-enroll existing enrollees into 2017 coverage. As part of the CMS data integrity review of the Plan ID Crosswalk Template, CMS will notify the issuer of any cases where a 2017 QHP or SADP is crosswalked to a 2017 Plan ID that uses a different Issuer ID. In these cases, CMS will require evidence from the state, such as e-mail confirmation, that the issuer is permitted to crosswalk plans in this manner. This evidence must include specific justification for the plans in question (for example, the 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 re-enrollment transactions on the FFM, 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, you may enter off-Exchange plans into the Plan ID Crosswalk by following these steps:

1. Import your 2016 Plans & Benefits Template following the Plan ID Crosswalk Template instructions. The **2016 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 **2017 Plan Crosswalk** tab.

3. On the **2017 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. (Ensure you only enter the allowable Crosswalk Level and Crosswalk Reason entries indicated in the Plan ID Crosswalk instructions.)

4. On the **2016 Plan Crosswalk** tab, enter the Plan IDs and Crosswalk Level entries for the off-Exchange Plan IDs you manually entered onto the **2017 Plan Crosswalk** tab. Ensure the Plan IDs and Crosswalk Level entries match across the two tabs.

5. Validate and finalize your template. ***Issuers should not submit a Plan ID Crosswalk Template for any off-Exchange plans to CMS.***

If your Plans & Benefits Template does not contain any on-Exchange plans, you will need to manually enter your 2016 Plans onto the **2016 Plan Crosswalk** tab before creating the 2017 tab. To do so, follow these steps:

1. Enter your Issuer Level information in the upper left hand corner of the **2016 Plan Crosswalk** tab (such as Issuer ID and Issuer State).

2. Enter all of your 2016 Plan IDs on the **2016 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 **2017 Plan Crosswalk** tab.

4. Click the button **"Create 2017"** tab and manually edit your crosswalk information for all of your 2016 plans.

5. Edit the **2016 Plan Crosswalk** tab to make your Crosswalk Level entries consistent between your 2016 and 2017 Crosswalk tabs in order to pass the template's validations.

6. Validate and finalize your template. ***Issuers should not submit a Plan ID Crosswalk Template for any off-Exchange plans to CMS.***