



DATE: September 16, 2011

TO: Issuers of Health Insurance

CC: State Departments of Insurance Commissioners

FROM: Doug Pennington
Director, CCIIO Web Services Division

SUBJECT: Plan Finder Data Submission for November Small Group Refresh

This memo is to provide guidance on submitting small group information for the November data refresh of Plan Finder on HealthCare.gov.

Starting on November 15, 2011, Plan Finder will expand information displayed on HealthCare.gov to include benefits and cost sharing information for the small group health insurance marketplace.

We have also revamped our data collection tools to make data entry easier and reduce errors. Our data collection tools have been integrated to reduce the burden from transferring data from one tool to another. Existing issuers may use their HIOS username/password for both HIOS and the Rate and Benefit Information System (RBIS). Issuers must continue to submit product-level information into HIOS. Benefit and cost sharing information should be entered into RBIS.

The first issuer training session on the updated data templates and reporting process will take place on **Friday, September 23, 2011**. Training will be via Webinar and conference call. Additional details on how to log into the training session will be provided in an upcoming memo. A second training will be held prior to the weekly User Group call for issuers on Wednesday, September 28, 2011.

The submission window for the November 15th refresh is limited to Small Group products. We will, however, allow issuers to submit additional product-level data in order to meet Rate Review data requirements during this submission window. Data submission for plans in the individual marketplace will occur during a separate window in December. Issuers will receive further guidance about the December data refresh in a future memo.

Updated HIOS and RBIS templates will be available to issuers by Monday, September 26, 2011. For the first time, issuers may submit HIOS and RBIS data either via XML or Excel format. Additional guidance will be available for issuers who intend to submit via XML.

Provided below is an outline of the data submission deadlines for the October small group data collection.

Small Group Data Submission Schedule

October 3 – October 7 – HIOS data submission window for all issuers:

All issuers must provide new small group data backup and CEO/CFO contact information in HIOS prior to the RBIS collection window. Issuers who did not update small group enrollment data for the September refresh, must provide the number of covered lives as of June 30, 2011.

Please note that all small group products, whether they are open or closed to enrollment must be reported to HIOS if there are covered lives within those products.

October 11 – October 21 – RBIS data submission window for all issuers:

RBIS is designed to automate the data submission, validation, and attestation processes. **All small group benefits and cost sharing data entered into RBIS must be submitted, validated, and attested by 11:59 p.m. ET on Friday, October 21.**

We strongly advise issuers begin the RBIS process immediately after the data submission window opens to allow enough time for data entry, validation, and CEO/CFO attestation.

Issuers are responsible for entering into RBIS benefit and cost sharing information for small group products that are **open for enrollment as of November 15, 2011.**

Issuers with new products must obtain a HIOS Product ID for those open products before submitting benefit and cost sharing data into RBIS. Please note that small group products that are no longer open for enrollment due to rate approvals or other product-level concerns should have their associated product marked as “closed” in HIOS. Issuers must make any necessary changes in HIOS before the HIOS data submission window closes on October 7th.

Validation of RBIS data:

The RBIS submission must be validated and approved by issuers. Issuers may validate their data within the RBIS system using two different methods: “View all Products” in the data submission or “Search by Scenario.” Detailed guidance about the validation process will soon be provided via issuer trainings and technical instructions.

CEO/CFO attestation deadline for all issuers:

All issuers submitting data into RBIS must provide CEO or CFO attestation to the accuracy and completeness of that data by 11:59 p.m. ET on Friday, October 21st.

CEO/CFO attestation will not be available until the RBIS system identifies that all of an issuer’s submissions have been uploaded or if it is indicated by the issuer that there is no data to report. Once attestation is made available to users, the CEO or CFO must read the attestation agreement and electronically sign an attestation statement. Detailed guidance about the attestation process will soon be provided via issuer trainings and technical instructions.

Issuer Group Calls:

Weekly User Group calls with issuers will continue to be held every other Wednesday at 2 p.m. ET to provide guidance and answer Plan Finder questions until further notice.

Summary of Key Dates

September 26 (Monday)	Revised HIOS and New RBIS Small Group Benefit & Cost Sharing Templates Available: Issuers may download templates to work off-line before the data submission windows open.
October 3 (Monday)	HIOS data submission window opens for issuers to update Small Group products and submit additional product-level data in order to meet Rate Review data requirements.
October 7 (Friday)	HIOS data submission window closes.
October 11 (Tuesday)	RBIS data submission window opens for all issuers to submit benefit and cost sharing small group data.
October 21 (Friday)	RBIS data submission window closes. All small group benefits and cost sharing data entered into RBIS must be submitted, validated, and attested by 11:59 p.m. ET.
November 15 (Tuesday)	Healthcare.gov Plan Finder will display new and updated Small Group data.

Association Data Submission

The following information pertains to all issuers with association products.

On September 6, 2011, CMS amended the Rate Increase Disclosure and Review final rule to expand the types of insurance products that are subject to the rate review reporting requirements. Starting on November 1, 2011, all association products will be subject to the rate review reporting requirements if they would be regulated as individual or small group market coverage if they were not sold through an association.

In order to accommodate the new rate review association reporting requirements, issuers must update product information utilizing Plan Finder's template in HIOS to include any association product that would be considered to be an individual or small group product under the new rate review rule. Guidance on the process and requirements for entering association products into HIOS will be provided in an upcoming memo.

Thank you for your participation and continued cooperation in the HealthCare.gov Plan Finder's data collection.

For policy questions regarding the HealthCare.gov Plan Finder, please email CCIIOPlanFinder@cms.hhs.gov.

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