

Key Dates in 2015:

QHP Certification in the Federally-Facilitated Marketplaces; Rate Review; Risk Adjustment, Reinsurance, and Risk Corridors

QHP Certification¹

Activity		Dates
QHP Application Submission and Review Process	Initial FFM QHP Application Submission Window ²	4/15/2015 – 5/15/2015
	First SERFF Data Transfer Deadline for States Performing Plan Management	5/15/2015
	FFM Review of Initial QHP Application Submissions Received as of May 15	5/18/2015 – 6/26/2015
	First Correction Notices Sent to Issuers and States	6/29/2015 – 6/30/2015
	Deadline for Submission of Revised QHP Data for Re-review; Second SERFF Data Transfer Deadline for States Performing Plan Management	7/10/2015
	FFM Review of Corrected QHP Application Submissions Received as of July 10	7/13/2015 – 8/12/2015
	Second Correction Notices Sent to Issuers and States	8/13/2015 – 8/14/2015
	Final Deadline for Submission of QHP Data; Final Deadline for State Plan Approval; Deadline for All Risk Pools with QHPs to be in a final status in the URR System ^{3,4} ; Final SERFF Transfer Deadline for States Performing Plan Management for Submission of QHP Data and Certification Recommendations; Data Locked Down	8/25/2015
	Final FFM Review of Corrected QHP Application Submissions Received as of August 25	8/26/2015 – 9/16/2015
QHP Agreement/Final Certification	Certification Notices and QHP Agreements Sent to Issuers	9/17/2015 – 9/18/2015
	Agreements Signed by Issuers and Returned to CMS with Final Plan List	9/21/2015 – 9/25/2015
	Validation Notice Confirming Final Plan List and Countersigned Agreements Sent to Issuers	10/8/2015 – 10/9/2015
Open Enrollment		11/1/2015 – 1/31/2016

¹ QHP certification information from the *Final 2016 Letter to Issuers in the Federally-Facilitated Marketplace* (2/20/15), available at <http://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/2016-Letter-to-Issuers-2-20-2015-R.pdf>

² URR and Form Filing submissions to CMS in States in which CMS is either the Effective Rate Reviewer or direct enforcer of Federal law follow the same Initial Submission Window and Deadline as the QHP Initial FFM QHP Application Submission Window. This submission deadline applies to URR and Form Filing submissions for QHPs and non-QHPs.

³ There are three final submission statuses in HIOS. All submissions that do not have any rate increases subject to review (rate increase less than 10 percent) must be in a status of "Rate Filing Accepted." For submissions with rate increases that are subject to review (rate increase of 10 percent or greater), the submission must be in a status of "Review Complete" if the rate increase received a determination of "not unreasonable," or in a status of "Final Justification Submitted" if the rate increase received a determination of "unreasonable" and the issuer has submitted the final justification.

⁴ All risk pools with no QHPs must be in a final status in the URR system by October 9, 2015.

Rate Review for Single Risk Pool Compliant Plans⁵

Activity	Dates
Initial Submission Deadline for Issuers to Submit QHP and Non-QHP Rate Filings into URR Module (unless a state sets an earlier deadline)	5/15/2015
Target Date to Post Initial Proposed Rate Increases of 10 Percent or Greater for Consumers to Review on https://ratereview.healthcare.gov	6/1/2015
Deadline for all QHP Rate Filings to be in a Final Status in the URR System <i>(Note: final rate information in each state must be made public at the same time for both QHPs and non-QHPs)</i>	8/25/2015
Deadline for all Non-QHP Rate Filings to be in a Final Status in the URR System <i>(Note: final rate information in each state must be made public at the same time for both QHPs and non-QHPs)</i>	10/09/2015
Target Date to Post Public Use File with Final Rate Data for QHPs and non-QHPs	10/30/2015

Risk Adjustment, Reinsurance, and Risk Corridors for PY2014⁶

Activity	Dates
First Bifurcated or Combined Reinsurance Contribution Amount for PY2014 Due	1/15/2015
Deadline for Submission of Transitional Plan Data for Risk Corridors	2/13/2015
Deadline for Submission of Final Risk Adjustment/Reinsurance data	4/30/2015
Deadline for Submission of Requests for Reinsurance Payments	4/30/2015
Risk Adjustment/Reinsurance Payment Report Sent to Issuers	6/30/2015
Deadline for Submission of Risk Corridors Data	7/31/2015
Preliminary Risk Corridors Transfers Calculation Sent to Issuers	8/14/2015
Remittance of Risk Adjustment/Reinsurance Issuer Payments and Charges	7/2015 – 9/2015
Sequestered FY2015 Risk Adjustment/Reinsurance Payments Available for Payment	10/1/2015
Remittance of Risk Corridors Payments and Charges	9/2015 – 12/2015
Second Bifurcated Reinsurance Contribution Amount for PY2014 Due	11/15/2015
Remittance of Reinsurance Issuer Payments from Second Contribution	12/2015 – 1/2016

⁵ Rate review dates from the *Final 2016 Letter to Issuers in the Federally-Facilitated Marketplace* (2/20/15), available at <http://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/Downloads/2016-Letter-to-Issuers-2-20-2015-R.pdf>; and from the *Insurance Bulletin Series – Information: Timing of Submission and Posting of Rate Increase Information* (4/14/2015), available at <http://www.cms.gov/CCIIO/Resources/Regulations-and-Guidance/index.html>

⁶ Risk Adjustment, Reinsurance, and Risk Corridors dates from the final rule *HHS Notice of Benefit and Payment Parameters for 2014 and Amendments to the HHS Notice of Benefit and Payment Parameters for 2014* (3/11/13), available at <http://www.gpo.gov/fdsys/pkg/FR-2013-03-11/pdf/2013-04902.pdf>